

Received
Washington State Supreme Court

MAY 26 2015

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Ronald R. Carpenter
Clerk

Supreme Court No. 91393-5

IN THE SUPREME COURT OF THE

STATE OF WASHINGTON

CERTIFICATION FROM THE WESTERN DISTRICT OF
WASHINGTON, UNITED STATES DISTRICT COURT

IN

SANDRA C. THORNELL, on behalf of herself and all others
similarly situated,

Plaintiff,

v.

SEATTLE SERV. BUREAU, INC. d/b/a NATIONAL SERV.
BUREAU, INC. and STATE FARM MUT. AUTO INS. CO.,

Defendants.

United States District Court Western District of Washington Case
No. C14-1601-MJP

DEFENDANT SEATTLE SERV. BUREAU, INC. d/b/a
NATIONAL SERV. BUREAU, INC.'s REPLY BRIEF – JOINDER IN
“REPLY BRIEF OF APPELLANT STATE FARM MUTUAL
AUTOMOBILE INSURANCE COMPANY”

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A. ARGUMENT

Seattle Serv. Bureau, Inc. d/b/a National Serv. Bureau, Inc.
("SSB") joins the arguments in "Reply Brief of Appellant State Farm
Mutual Automobile Insurance Company".

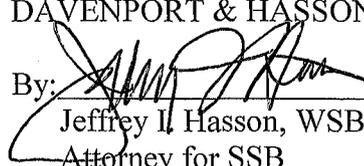
B. CONCLUSION

SSB respectfully requests that this Court answer the first question
posed by the District Court, "No", and conclude that the WCPA does not
create a cause of action for a plaintiff residing outside the state of
Washington to sue SSB, or any Washington corporate defendant.

Dated this 20th day of May, 2015.

Respectfully submitted,

DAVENPORT & HASSON, LLP

By: 

Jeffrey L. Hasson, WSBA No. 23741

Attorney for SSB

C. DECLARATION OF SERVICE

I, April Kahan, declare that on this 20th day of May, 2015, I placed in the mails of the United State Postal Service an original and one copy of **Defendant Seattle Serv. Bureau, Inc. d/b/a National Serv. Bureau, Inc.’s Reply Brief**– Joinder In “Reply Brief of Appellant State Farm Mutual Automobile Insurance Company”, addressed to the Supreme Court, Temple of Justice, PO Box 40929, Olympia, WA 98504-0929, and served upon the parties indicated below by Mail and Email:

<p>James L. Kauffman Michael L. Murphy Attorneys at Law Bailey & Glasser, LLP 910 17th Street NW, Suite 800 Washington, DC 20006</p> <p>jkauffman@baileyglasser.com mmurphy@baileyglasser.com</p> <p><i>Attorneys for Plaintiff</i></p>	<p>Thomas J. Frederick Cornelius M. Murphy Linda T. Coberly Attorneys at Law Winston & Strawn LLP 35 W Wacker Drive Chicago, IL 60601 9703</p> <p>TFrederi@winston.com NMurphy@winston.com LCoberly@winston.com</p> <p><i>Attorneys for State Farm</i></p>
<p>Beth Ellen Terrell Attorney at Law Terrell Marshall Daudt & Willie, PLLC 936 North 34th Street, Suite 300 Seattle, WA 98103 8869</p> <p>bterrell@tmdwlaw.com</p> <p><i>Attorney for Plaintiff</i></p>	<p>Joe Hampton Daniel L. Syhre Attorneys at Law Betts Patterson Mines, P.S. 701 Pike St. #1400 Seattle, WA 98101</p> <p>jhampton@bpmlaw.com dsyhre@bpmlaw.com</p> <p><i>Attorneys for State Farm</i></p>

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 20th day of May, 2015 at Portland, Oregon.

April Kahan
April Kahan
Legal Assistant
Davenport & Hasson, LLP