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No. 92362-1

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SUPREME COURT OF THE STATE  
OF WASHINGTON

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DEAN WILCOX,

Petitioner,

v.

BARTLETT SERVICES, INC., and ELR CONSULTING, INC.

Respondents.

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PETITIONER'S SUPPLEMENTAL BRIEF

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Mel Crawford, WSBA #22930  
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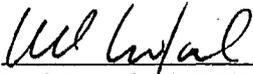
Attorneys for Petitioner Dean Wilcox

 ORIGINAL

*"Nemo dat quod non habet"* – no one can give what he does not have. ELR Consulting, Inc. denied employing or controlling Mr. Basehore. It thus could not loan him to Washington Closure Hanford ("WCH").

Bartlett Services, Inc.'s contract with ELR incorporated all terms of ELR's contract with WCH, including that WCH did not employ Mr. Basehore. Ex. 222 at BSI-2, 28.

RESPECTFULLY SUBMITTED this 29th day of April, 2016.

  
\_\_\_\_\_  
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CERTIFICATE OF SERVICE

That on April 29, 2016, I arranged for filing of the foregoing Petitioner's Supplemental Brief with the Supreme Court of the State of Washington, and arranged for service of a copy of the same on the parties to this action as follows:

Supreme Court of Washington:

Office of Clerk  
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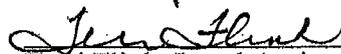
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DATED this 29<sup>th</sup> day of April, 2016, at Seattle, Washington.

  
Terri Flink, Legal Assistant

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**To:** Terri Flink  
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**Subject:** Case No. 92362-1 -- Wilcox v. Bartlett Services, Inc., ELR Consulting

Attached for filing into Case No. 92362-1 -- Wilcox v. Bartlett Services, Inc., ELR Consulting is Petitioner's Supplemental Brief, which is being submitted by Petitioner's attorneys, Mel Crawford, WSBA #22930 and David Whedbee, WSBA # 35977. Mr. Crawford's contact information is: Law Office of Mel Crawford, 705 2<sup>nd</sup> Avenue, Suite 1500, Seattle, WA 98104; 206-694-1614; [melcrawford@melcrawfordlaw.com](mailto:melcrawford@melcrawfordlaw.com). Mr. Whedbee's contact information is: MacDonald Hoague & Bayless, 705 2<sup>nd</sup> Avenue, Suite 1500, Seattle, WA 98104; 206-622-1604; [davidw@mhb.com](mailto:davidw@mhb.com).

As indicated in the Certificate of Service attached to the supplemental brief, Respondents' counsels of record, Mark Dynan, Maura McCoy, and Douglas Weigel, are being served a paper copy of the document via legal messenger.

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