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Supreme Court Case No. 95575-1

IN THE SUPREME COURT
OF THE STATE OF WASHINGTON

RANDY REYNOLDS & ASSOCIATES, INC.,

Respondent,

v.

KASEY HARMON, ET AL.,

Petitioner.

AMICUS CURIAE BRIEF OF THE TACOMA-PIERCE COUNTY
HOUSING JUSTICE PROJECT

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I. INTRODUCTION

Respondent Randy Reynolds & Associates, Inc. (“Reynolds”) obtained an order of default, default judgment, and writ of restitution in an unlawful detainer action against Petitioner Kasey Harmon (“Harmon”). Harmon subsequently moved the superior court ex parte to vacate the default judgment and stay the accompanying writ of restitution pursuant to CR 60 and 62. The superior court set a hearing on Harmon’s motion to vacate default judgment, and granted a stay of the writ of restitution until the hearing. The superior court did not require Harmon to post a bond as security in order to obtain the stay of the writ of restitution. Harmon eventually lost her motion to vacate default judgment, and the stay on the writ of restitution was lifted. Despite prevailing on Harmon’s motion to vacate default judgment, Reynolds appealed.

The Court of Appeals held that the superior court commissioner erred by hearing ex parte Harmon’s motion to stay the writ of restitution. The Court of Appeals additionally held that the superior court erred by granting Harmon’s motion to stay without providing Reynolds notice and opportunity to inquire into bond pursuant to RCW 59.18.390(1).

The Court of Appeals decision is incorrect. The appellate court’s reasoning fails to consider the procedural posture of Harmon’s case—post-final judgment—at the time Harmon moved to vacate the default

judgment and writ of restitution. CR 60 provides superior courts with a specific notice procedure for motions to vacate default judgments, which does not require notice to the opposing party until after the court sets a show cause hearing on the motion to vacate. CR 62 also grants broad equitable authority for courts to stay proceedings to enforce judgments during the pendency of a motion to vacate, and does not require that the opposing party be given an opportunity to examine into the sufficiency of any required security prior to issuance of a stay.

Furthermore, without addressing or analyzing the RLTA's statutory scheme, the Court of Appeals applied a single statutory subsection of the Residential Landlord-Tenant Act ("RLTA"), RCW 59.18.390(1), and on that basis incorrectly concluded that Reynolds was entitled to notice and an opportunity to inquire into the sufficiency of a bond after Harmon moved the superior court to vacate Reynolds' default judgment and stay Reynolds' writ of restitution under CR 60 and 62.

A more complete examination of the unlawful detainer process and statutory scheme as a whole shows that RCW 59.18.390(1) simply does not contemplate nor apply to a motion to vacate judgment under CR 60 and associated stay of a writ of restitution under CR 62. Rather, the stay contemplated by RCW 59.18.390(1) is a tenant protection designed to enable a tenant to retain possession of the premises after issuance of a writ

of restitution at unlawful detainer show cause hearing, but prior to the ultimate unlawful detainer trial. The stay in RCW 59.18.390(1) simply does not apply after final judgment. As a result, the Court of Appeals' decision transforms a substantive pre-trial tenant protection into a post-default procedural hurdle—making timely review of unlawful detainer default judgments impractical, if not impossible, regardless of whether the default judgment was properly or improperly issued.

II. IDENTITY AND INTEREST OF AMICUS CURIAE

The Tacoma-Pierce County Housing Justice Project (“HJP”) is a program of Tacoma Pro Bono, a 501(c)(3) non-profit in Pierce County. Under the supervision and direction of HJP staff, the HJP marshals the contributions of local volunteer attorneys to provide pro bono limited representation to low-income tenants facing eviction proceedings and other housing-related matters throughout Pierce County. A low-income tenant qualifies for HJP assistance if the tenant’s income is below 200% of federal poverty guidelines or 400% of federal poverty guidelines for military veterans. The scope of the HJP’s pro bono representations to low-income tenants range from legal advice on housing issues, to direct representation during unlawful detainer show cause hearings and motions

to vacate default judgments, through unlawful detainer trials and appeals.¹ Since 2015, the HJP has represented 1,123 low-income tenants in unlawful detainer actions and other housing-related issues.

Since low-income tenants are particularly encumbered with regard to housing choices and availability, the HJP has a direct interest in ensuring the rights provided to all tenants under general civil rules and the Residential-Landlord Tenant Act, 59.18 RCW, are protected and enforced.

III. ISSUES ADDRESSED BY AMICUS CURIAE

1. Whether the Court of Appeals erred by holding RCW 59.18.390(1) requires a plaintiff to receive notice and opportunity to be heard regarding bond when a defendant moves to vacate a default judgment and stay writ of restitution?
2. Whether the Court of Appeals erred by failing to consider CR 62 and the trial court's inherent equitable authority as a basis for support of the trial court's decision to stay the writ of restitution?

IV. STATEMENT OF THE CASE

The HJP adopts the facts set forth in Harmon's Petition for Review. *See* Petition, 2-5.

The HJP calls specific attention to the fact that Reynolds' only entitlement to relief in this unlawful detainer was pursuant to entry of a

¹ The services the HJP provides to any particular low-income tenant can include just one aspect of this list of services or multiple aspects.

default judgment and issuance of a writ of restitution pursuant to the default judgment. (CP 20-22).

V. ARGUMENT

A. The Court of Appeals Erred by Applying RCW 59.18.390 to Harmon's Motion to Vacate Default Judgment and Stay of Writ of Restitution

The Court of Appeals erred by holding that RCW 59.18.390(1) required Reynolds to receive notice and an opportunity to inquire into the sufficiency of a bond when Harmon moved the superior court to vacate Reynolds' default judgment and stay the writ of restitution. *Reynolds v. Harmon*, 1 Wn.App.2d 239, 250-53, 404 P.3d 602 (2017). The Court of Appeals misapplied RCW 59.18.390(1) by failing to properly frame the procedural posture of Harmon's case, thereby confusing the relevant inquiry. Instead of scrutinizing the issues presented by examining how default judgments fit into the unlawful detainer statutes, the Court of Appeals seized upon RCW 59.18.390(1) as a standalone provision generally applicable to all stays of writs of restitution, regardless of the procedural posture of a case.² To the contrary, the stay provisions in RCW 59.18.390(1) apply only to stay writs of restitution issued at a show

² Tellingly, the Court of Appeals fails to even mention the default outside of its statement of facts. See *Reynolds v. Harmon*, 1 Wn.App.2d 239, 404 P.3d 602 (2017) (no mention of default judgment outside of statement of facts).

cause hearing in order to afford tenants a method of retaining possession of the premises prior to ultimate resolution of the unlawful detainer at trial. *See Housing Auth. of City of Pasco & Franklin County v. Pleasant*, 126 Wn.App 382, 393, 109 P.3d 422 (2005).

1. RCW 59.18.390(1) Does Not Apply to Motions to Vacate Default Judgment and Accompanying Stays of Writs of Restitution.

Neither the plain language nor the related statutory scheme of 59.18 RCW supports the Court of Appeals' application of RCW 59.18.390(1) to a stay of writ of restitution issued pending a hearing on a motion to vacate a default judgment. *See Dep't of Ecology v. Campbell & Gwinn, LLC*, 146 Wn.2d 1, 10-11, 43 P.3d 4 (2002) (legislative intent derived from plain language, considering the text of the provision, the context of the statute in which the provision is found, related provisions, and the statutory scheme as a whole).

Understanding the unlawful detainer process is crucial to properly applying RCW 59.18.390(1) and, by extension, the civil rules. Unlawful detainer actions are special proceedings intended to provide a party rightfully entitled to possession of real property with a summary method of recovering possession from one guilty of unlawful detainer. *Muscatel v. Storey*, 56 Wn.2d 635, 638, 354 P.2d 931 (1960). At any time during an

unlawful detainer proceeding the landlord may apply to the court for an order directing the tenant to appear and show cause why a writ of restitution should not issue restoring the landlord to possession of the property. RCW 59.18.370. At show cause hearing the court examines the parties to ascertain the merits of the complaint against the tenant's answer. RCW 59.18.380. Whether or not the court issues a writ of restitution at show cause hearing, the court is *required* to enter an order directing the matter to proceed to trial.

At the time and place fixed for the hearing of plaintiff's motion for a writ of restitution . . . *if it shall appear that the plaintiff has the right to be restored to possession* of the property, the court shall enter an order directing the issuance of a writ of restitution . . . The *court shall also enter an order directing the parties to proceed to trial* on the complaint and answer in the usual manner.

If it appears to the court that the plaintiff should not be restored to possession of the property, the court shall deny plaintiff's motion for a writ of restitution and *enter an order directing the parties to proceed to trial within thirty days on the complaint and answer.*

RCW 59.18.380 (italics added); *Meadow Park Garden Assoc. v. Canley*, 54 Wn.App 371, 374, 773 P.2d 875 (1989). This is because the show cause hearing is a summary determination of which party shall have immediate possession and is "not the final determination of the rights of the parties in an unlawful detainer action." *Carlstrom v. Hanline*, 98 Wn.App 780, 788, 990 P.2d 986 (2000). The final determination of the

rights of the parties occurs only once the court issues final judgment, generally following trial.

If upon the trial the verdict of the jury, or if the case be tried without a jury . . . be in favor of the plaintiff . . . judgment shall be entered for the restitution of the premises . . . the judgment shall also declare the forfeiture of the lease, agreement, or tenancy.

RCW 59.18.410 (italics added); *Pleasant*, 126 Wn.App at 393 (stating “RCW 59.18.410 also requires entry of a final judgment following trial”).

Since a plaintiff may move the court at any time for the summary issuance of a writ of restitution at show cause hearing pending trial, RCW 59.18.390(1) provides tenants the important substantive protection of allowing a tenant the option to continue occupying the premises after a summary determination that a writ of restitution shall issue following a show cause hearing.

A bond is required only if the tenant wishes to continue to occupy the premises pending trial. It is to secure the landlord against losses during the pendency of the proceedings when the tenant continues to occupy the premises.

Pleasant, 126 Wn.App at 393 (analyzing RCW 59.18.390’s bond procedure). For a tenant to exercise the option of continuing to occupy the premises pending trial, the tenant “*may execute to the plaintiff a bond to be filed with . . . the court.*” RCW 59.18.390(1) (italics added); *see also Pleasant*, 126 Wn. App. at 393. In turn, the plaintiff “shall have notice of

the time and place where the court or judge thereof shall fix the amount of the defendant's bond." RCW 59.18.390(1).

In other words, RCW 59.18.390(1) creates a specific method for tenants to optionally stay a writ of restitution and retain possession of the premises pending trial after issuance of a writ of restitution at a show cause hearing. If exercised by a tenant, RCW 59.18.390(1) requires the plaintiff to be provided notice of the time and place where the amount of the bond may be set.

Despite the narrow ambit of RCW 59.18.390(1), the Court of Appeals applied RCW 59.18.390(1) to Harmon's motion to vacate default judgment and stay writ of restitution, concluding "the superior court commissioner erred as a matter of law when the commissioner waived the bond in violation of [RCW 59.18.390]". *Reynolds*, 1 Wn.App.2d at 252.

Yet RCW 59.18.390(1) did not apply, much less control. In this case, there was no unlawful detainer show cause hearing, nor was the unlawful detainer set for trial. There was no unlawful detainer show cause hearing because Reynolds had already reached the conclusion of the unlawful detainer process by obtaining a final judgment by default. *See Seattle Nat. Bank v. School Dist. No. 40*, 20 Wn. 368, 372-73, 55 P. 317 (1868) ("A judgment by default is attended with the same legal consequence as if there had been a verdict for the plaintiff.") (internal

citations omitted). Similarly, no trial was set in the case because a final judgment had already been entered, and any trial date stricken. Since Reynolds had already obtained final judgment through default, Harmon could not have invoked RCW 59.18.390(1)'s optional bond to maintain possession pending trial *even if Harmon had requested such a bond*.

Instead, Harmon's options to stay a writ of restitution post-final judgment by default lie elsewhere in the unlawful detainer statutes and in the civil rules. Because default judgments are final judgments, a party seeking to challenge a default judgment may either file a direct appeal of the default judgment or move to vacate the default judgment under CR 60. *See Whatcom County v. Kane*, 61 Wn.App 250, 253, 640 P.2d 1075 (1981); RAP 2.2(a)(1); CR 55(c)(1). Had Harmon chosen to file a direct appeal of the default judgment, Harmon could have obtained a stay of the writ of restitution via RCW 59.12.200. *Id.* (bond for stay during appellate review). Instead, Harmon properly elected to move to vacate the default judgment under CR 60 and obtain a stay from the writ of restitution under CR 62, as discussed further below.

In sum, RCW 59.18.390(1) simply does not allow a tenant to stay a writ of restitution post-final judgment. Since Harmon was moving the court to stay the writ of restitution pending a hearing on the merits of Harmon's motion to vacate default judgment, RCW 59.18.390(1) and its

notice requirements were inapplicable, and the court had discretionary authority to set the conditions under which Harmon could proceed to a hearing on her motion to vacate. CR 62(b) (“In its discretion and on such conditions for the security of the adverse party as are proper, the court may stay the execution of or any proceedings to enforce a judgment pending . . . a motion for relief from judgment or order made pursuant to rule 60”). The Court of Appeals’ reliance on RCW 59.18.390(1) and its notice requirements was therefore error.

B. Harmon Properly Obtained a Stay of the Writ of Restitution in Conjunction with Her Motion to Vacate Default Judgment Pursuant to CR 60 and 62.

1. The civil rules apply to unlawful detainer proceedings unless they are expressly inconsistent with the plain language of the unlawful detainer statutes.

The general civil rules apply to “all suits of a civil nature,” including unlawful detainer actions, except “where *inconsistent* with rules or statutes applicable to special proceedings.” CR 1; CR 81(a) (italics added); *see also State ex rel. Smith v. Parker*, 12 Wn. 685, 688, 42 P. 113 (1895).

Courts decline to apply CR 81(a) in unlawful detainer proceedings unless express inconsistencies exist between the plain language of the unlawful detainer statutes and the general civil rules. *Thompson v. Butler*, 4 Wn.App. 452, 454, 482 P.2d 791 (1971) (no inconsistency between civil

rules and unlawful detainer statutes regarding jury trials under CR 38 and 39); *Kelly v. Powell*, 55 Wn.App. 143, 148, 776 P.2d 996 (1989) (no inconsistency between entry of default judgments under CR 54 and unlawful detainer statutes); *Canterwood Place L.P. v. Thande*, 106 Wn.App. 844, 846, 25 P.3d 495 (2001) (no inconsistency in computation of time under civil rules and unlawful detainer summons statute).

Here, no inconsistency exists between the plain language of RCW 59.18.390(1) and the general civil rules, therefore CR 81(a) is inapplicable. No inconsistency exists because RCW 59.18.390(1) does not contemplate nor apply to stays of writs of restitution made pursuant to CR 62 and a motion to vacate default judgment under CR 60. As explained in detail above, the subject matter contemplated by RCW 59.18.390(1) is whether a tenant may retain possession of the premises pending trial by posting bond after the issuance of a writ of restitution at unlawful detainer show cause hearing. The plain language of RCW 59.18.390(1) does not hint at—much less expressly provide—a procedure for moving to vacate a default judgment and staying a writ of restitution. Put another way, Harmon moved the court pursuant to CR 60 to argue the default judgment was improperly issued based upon Harmon’s alleged appearance prior to the deadline for default, not that Harmon should continue to occupy the premises after show cause hearing and pending

trial. As a result, the superior court properly applied the general civil rules applicable to vacation of default judgments and a stay of associated proceedings.

2. CR 60 and 62 provide the correct method for moving to vacate a default judgment and staying execution of any proceedings to enforce the judgment pending a hearing on the motion to vacate.

CR 55, 60, and 62 govern the applicable procedure for motions to vacate default judgments and stay associated post-judgment proceedings. CR 55 provides discretionary authority for courts to set aside default judgments in accordance with CR 60(b) “for good cause shown and *upon such terms as the court deems just.*” CR 55(c)(1) (emphasis added).

In turn, CR 60 provides a specific motion and notice procedure by which a defendant may move to vacate a judgment:

Motion: Application shall be made by motion filed in the cause stating the grounds upon which relief is asked, and supported by the affidavit of the applicant . . . setting forth a concise statement of the facts of errors upon which the motion is based . . .

Notice: Upon the filing of the motion and affidavit, the court shall enter an order fixing the time and place of the hearing thereof and directing all parties to the action or proceedings who may be affected thereby to appear and show cause why the relief asked for should not be granted.

Service: The motion, affidavit, and the order to show cause shall be served upon all parties affected in the same manner as in the case of summons in a civil action at such

time before the date fixed or the hearing as the order shall provide.

CR 60(e)(1)-(3) (italics added). Lastly, CR 62 specifically authorizes courts with the discretion to stay execution of any proceedings to enforce default judgments in conjunction with a motion to vacate:

In its discretion and on such conditions for the security of the adverse party as are proper, the court may stay the execution of or any proceedings to enforce a judgment pending the disposition . . . of a motion for relief from a judgment or order made pursuant to rule 60.

CR 62(b) (italics added). Piecing together CR 55, 60, and 62, a defendant initially moves a court to vacate a default judgment through a filed motion with a supporting affidavit asserting the legal basis. CR 60(e)(1). Upon defendant's filing, the court must enter an order setting the time and place of a show cause hearing where the merits of the motion to vacate will be determined. CR 60(e)(2). The court also has discretion—under such terms as the court deems just—to stay execution of any proceedings to enforce a judgment pending the outcome of the show cause hearing. CR 62(b). Only then must the motion, affidavit, and order to show cause be served upon the plaintiff. CR 60(e)(3).

In this case, the Court of Appeals held that CR 5(a) entitled Reynolds to be served with the motion to vacate default judgment *prior* to Harmon moving the court to set a show cause hearing on Harmon's

motion to vacate the default judgment. *Reynolds v. Harmon*, 1 Wn.App.2d 239, 246, 404 P.3d 602 (2017). Yet the Court of Appeals failed to mention, examine, or apply the specific procedure contained in CR 60 to initiate a motion to vacate default judgment. CR 5(a), by its terms, generally applies “[e]xcept as otherwise provided in these rules.” CR 5(a). And CR 60 specifically provides otherwise—notice of the motion to vacate, accompanying affidavit, and order to show cause need only be served upon the plaintiff after the court has considered the motion and set the date of the show cause hearing.

The Court of Appeals then inappropriately leveraged Reynolds’ lack of notice into an analysis of ex parte contact under CJC Rule 2.9(A), stating, “The motion here addressed substantive matters because the matter impacted Reynolds’ right to regain possession of its property under the writ of restitution.” *Reynolds*, 1 Wn.App.2d at 250. However, the question confronted by the superior court in Harmon’s motion to vacate default judgment was not whether Reynolds’ right to possession of the property was impacted, but whether Reynolds properly obtained a default judgment against Harmon—a question in no way related to the substantive issue of whether Harmon was guilty of unlawful detainer and Reynolds was therefore entitled to regain possession of the property. Indeed, if the

default judgment were improperly obtained, Reynold's right to *any remedy* from the default would be improper.

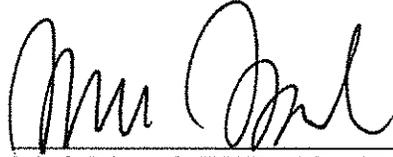
In sum, the procedure contained in CR 55, 60, and 62 provides a specific method for moving to vacate a default judgment and staying the accompanying writ of restitution pending a hearing on the motion. That method does not require prior notice to the plaintiff. Ex parte presentation of the motion to vacate and equitable stay of the accompanying writ of restitution without prior notice to the plaintiff was therefore proper.

VI. CONCLUSION

For the reasons set forth above, the Tacoma-Pierce County Housing Justice Project urges this Court to reverse the Court of Appeals and hold that RCW 59.18.390(1) does not apply to motions to vacate unlawful detainer default judgments and stays of writs of restitution, and hold that the correct procedure for superior courts to apply to such motions is contained in general civil rules 55, 60, and 62.

RESPECTFULLY SUBMITTED this 10th day of September, 2018.

TACOMA-PIERCE COUNTY HOUSING JUSTICE PROJECT

A handwritten signature in black ink, appearing to read 'Mark Morzol', written over a horizontal line.

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