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Supreme Court No. 95813-1

IN THE SUPREME COURT
OF THE STATE OF WASHINGTON

CHONG and MARILYN YIM, KELLY LYLES, BETH BYLUND, CAN APARTMENTS, LLC, and EILEEN, LLC,
Respondents,
v.
CITY OF SEATTLE,
Appellant.

BRIEF OF AMICUS CURIAE BUILDING INDUSTRY ASSOCIATION OF WASHINGTON

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TABLE OF CONTENTS

TABLE OF AUTHORITIES

Cases

Statutes

Other Authority

I. INTRODUCTION

In 2016, the City of Seattle ("City") passed the "First-In-Time" rule or FIT, which requires landlords to rent to the first "qualified" rental applicant regardless of the relative qualifications of a different applicant or any other considerations. Several Seattle landlords challenged the ordinance on many legal bases. The trial court ruled in favor of the landlords on all of their claims. The City appealed.

The Building Industry Association of Washington urges this Court to affirm the trial court's decision. To do otherwise would require this Court to overturn existing precedent that has been relied upon by the building industry for decades. Furthermore, FIT does not serve the government interest the City of Seattle claims, curing unequal access to housing, because it creates uncertainty in the housing market leading to decreased development and more expensive rentals.

The City's position ignores the unintended consequences of FIT on the supply of affordable housing. Access to housing for low income Seattleites is at crisis levels. FIT exacerbates these problems by driving up the minimum criteria for applicants which in turn reduces the pool of qualified candidates. FIT also increases the costs of regulatory compliance for landlords. These costs are passed on to tenants and added to the amount of rent. While larger rental companies may be better positioned to absorb these extra costs, the small landlord with one single family property will be less positioned to do so. This will reduce supply which is exactly the opposite desired outcome if the City's goal is to make housing more affordable. In short, FIT and the City's arguments in support are detrimental to the building industry, undermine property rights, and will make housing affordability worse, and therefore the trial court's ruling should be affirmed.

II. IDENTITY AND INTEREST OF AMICUS CURIAE

The Building Industry Association of Washington ("BIAW") represents nearly 8,000 members of the home-building industry. BIAW is made up of 16 affiliated local associations: the Building Industry Association of Clark County, the Central Washington Home Builders Association, the Jefferson County Home Builders Association, the Master Builders Association of King and Snohomish Counties, the Home Builders Association of Kitsap County, the Lower Columbia Contractors Association, the North Peninsula Building Association, the Olympia Master Builders, the Master Builders Association of Pierce County, the San Juan Builders Association, the Skagit-Island Counties Builders Association, the Spokane Home Builders Association, the Home Builders Association of Tri-Cities, and the Building Industry Association of Whatcom County.

BIAW's members are engaged in every aspect of the residential construction industry and the vast majority of BIAW builders construct between 1 and 5 single-family houses per year. They are directly affected by any change in incentives that impact housing and are ideally placed to analyze the impact the FIT rule has had, and will have, on the housing supply going forward.

III. ISSUE OF INTEREST TO AMICUS CURIAE

1) Whether binding precedent directs this Court to find that FIT takes landlords' property.
2) Whether the government interest the City of Seattle claims prompted the passage of FIT, curing unequal access to housing, is actually served by FIT.

IV. ARGUMENT

a. This Court Should Not Overturn Existing Precedent That Defends the Right of First Refusal As a Key Aspect of Property Rights.

This Court would not be justified in overturning *Manufactured Housing Cmtys. of Wash. v. State*, 142 Wn.2d 347, 13 P.3d 183 (2000). Furthermore, overturning precedent creates an unreliable regulatory environment which deters investment in new housing, exacerbating the competition and keeping vulnerable populations out of homes.

The City of Seattle has argued that the Court should overturn the nearly 20-year-old precedent in *Manufactured Housing Cmtys. of Wash. v. State*, 142 Wn.2d 347, 13 P.3d 183 (2000) ("*Manufactured Housing*"). Because the City has not demonstrated the factors under the doctrine of *stare decisis* necessary to make such a sea change in the law undergirding property rights, this Court should decline the City's invitation to do so. While BIAW will rely upon the brief of Respondent Yim in describing the case law governing a court's review of established precedent and agrees with Respondent's position that the test is not met here, BIAW would like to offer the Court its position on the building industry's reliance on the case.

Manufactured Housing stands for the proposition that the right of first refusal is a key aspect of property ownership. The case involved the purchase of property and the right of a seller to pick a purchaser (in the absence of discriminatory factors already prohibited by law). This fundamental aspect of property ownership was determined by the case and has been relied upon by the building industry (and other related industries) for nearly the last two decades.

If this case is overturned, there will be uncertainty for builders concerning what to expect in future regulations. For example, BIAW members are concerned that a new ordinance could be proposed, similar to FIT, applied in the context of home sales. In this scenario, a seller would be required to publish a government-mandated list of criteria for the sale of a home and would have to accept the first offer that met it, regardless of other factors such as a better price. In the absence of *Manufactured Housing* as binding precedent, similar arguments could be advanced in support of the constitutionality of an ordinance or state law allowing for rent control. Overturning *Manufactured Housing* opens the door to this type of regulation that undermines property rights.

Regulation, unbounded by the precedent currently in place, would then drive up housing costs. In California, a recent government-funded study which sought to analyze the causes of the high cost of housing in that state, indicated that government regulation can add dramatically to rent prices by driving down the supply of available housing in addition to the construction cost of homes. The study noted:

> Renters and home buyers compete for a limited number of apartments and homes, bidding up prices far in excess of building costs. Building costs account for around one-third of home prices in California's coastal metros. Under these circumstances . . ., increasing competition for limited housing is the primary driver of housing cost growth in coastal California.[1]

In Seattle, increasing competition for an artificially limited supply of housing is having a similar effect on housing and rental prices. Uncertainty among builders when making decisions make home rentals and sales less

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[1] Legislative Analyst's Office, California Legislature, CALIFORNIA'S HIGH HOUSING COSTS: CAUSES AND CONSEQUENCES 14 (2015).

attractive investments to landlords, builders, developers and sellers. The relationship between regulatory uncertainty and market shrinkage is taken as a given in the economic community.

> "[F]irms worldwide regularly make decisions under varying conditions of political uncertainty: How secure are property rights? Are contracts enforceable? […] The credibility of these political institutions fundamentally shapes the ability of firms to make capital investment decisions[.]"[2]

In short, regulation makes homeowners less inclined to build a new home or remodel an existing home in a manner that makes it suitable to rent. Limiting supply and increasing competition inherently reduces affordability, further excluding low income households from the rental or home buying market.

b. Although Access to Housing is at Crisis Levels, FIT Is Not a Rational Solution to the Problem.

The City asserts: 1) that FIT passes rational basis scrutiny because it has a substantial relationship to the public welfare; and 2) that FIT causes no economic harm. Opening Brief at 3,4. *Amicus* respectfully disagrees. FIT exacerbates shortages in low-cost housing and forces landlords managing low-cost housing out of the market, creating a substantial economic harm. While the goal of housing access is one BIAW fully supports, FIT's

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[2] Andrew B. Whitford, *The Reduction of Regulatory Uncertainty: Evidence from Transfer Pricing Policy*, 55 St. Louis U. L.J. 269, 273 (2010) *available at* https://pdfs.semanticscholar.org/d724/284131279b4c7a9d7a76d1be6756870a819d.pdf.

unintended consequences keep people out of housing, rather than welcoming them home.

There is a housing crisis in the City of Seattle. As of May 2018, there were approximately 12,112 homeless people in King County.[3] Prior to FIT, discrimination on the basis of sex, marital status, sexual orientation, race, creed, color, national origin, presence of children, military status, disability, or use of a service animal in real estate transactions was illegal. RCW 49.60.222. However, the data shows that in spite of legal protections, vulnerable populations still face more evictions and higher rates of homelessness than the population generally.[4]

The City has used this fact to justify the creation of the First-In-Time rental rule, SMC 14.08.050, aimed at further eliminating discrimination in housing access. The rule will not have the effect of increasing housing options for those vulnerable populations who most typically are subject to that bias. FIT contributes to housing scarcity, reducing the supply of rental housing to those marginalized communities it is designed to protect.

c. FIT Forces Landlords to Use Higher Minimum Criteria.

[3] *Seattle, King County Homeless Count Shows More People Living in Vehicles*, King 5 News (May 31,2018), https://www.king5.com/article/news/local/seattle/seattle-king-county-homeless-count-shows-more-people-living-in-vehicles/281-560277978

[4] Tara Cookson, PhD, Margaret Diddams, PhD, Xochitl Maykovich, Edmund Witter, Seattle Women's Commission, LOSING HOME: THE HUMAN COST OF EVICTION IN SEATTLE 20-29 (2018)

In order to comply with FIT, landlords are likely to list more detailed application criteria since they are forced to contract with whoever meets it. As criteria become more detailed and specific, this in turn will by necessity reduce the pool of qualified tenants.

The Rental Housing Audit ("Audit") performed by the City of Seattle and the University of Washington to fulfill SMC § 14.08.050's review requirement proved that this unintended consequence is not merely hypothetical. In one focus group, a landlord put it quite plainly:

> "Basically, you're going to have more criteria. And you're going to make it a little bit more onerous at the front end. So that you aren't taking as many chances. Because, I will tell you, for years, I have let people pay for their security deposit and last month's rent over a period of four months… Because I know. I was a renter. I was a renter way before I was a landlord and so I looked at these kinda things. And I am more than willing to do that, but I don't want somebody telling me I have to do that. I do it because that person has given me an indication that they will probably be able to handle it. That whatever their issues were before, they've got it under control… They have convinced me personally that I should take that little chance with them."[5]

This sentiment is not merely the view of one respondent in a focus group. It is also borne out in the survey of almost 4000 landlords in Seattle who were asked about FIT. 63.45% of surveyed landlords said they had or intended to

[5] Office of City Auditor, City of Seattle, UNIVERSITY OF WASHINGTON SEATTLE RENTAL HOUSING STUDY FINAL REPORT ("Audit") 12 (2018) *available at* https://www.seattle.gov/Documents/Departments/CityAuditor/auditreports/UWSRHSFINAL.pdf

raise their rental criteria in response to new rental ordinances.[6] When asked which regulation had influenced their decision raise criteria, 54.13% selected FIT.[7] When asked "How strongly do you agree that FIT has reduced your ability to rent to those with few resources?" 65% of respondents agreed or strongly agreed.[8]

Refusal to rent to those who have faced disadvantage is the precise ill FIT was supposed to solve. Instead, FIT has made it impossible for those with less than perfect credit, with a prior eviction, without provably steady income, to find homes.

d. FIT Creates Regulatory Costs Resulting in a Less Diverse Stock of Housing Options

A reduced housing supply cannot help but increase the cost of rent.[9] The Audit shows FIT is already pushing landlords of all sizes out of the housing market, but the data below shows that the cost of FIT is most detrimental to small landlords. Furthermore, while large, multi-family rentals are likely to be bought and rented back out by less risk-averse

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[6] Office of City Auditor, City of Seattle, UNIVERSITY OF WASHINGTON SEATTLE RENTAL HOUSING STUDY FINAL REPORT, APPENDIX B ("Appendix B") 367 (2018) *available at* https://www.seattle.gov/Documents/Departments/CityAuditor/auditreports/UWSRHSAppB.pdf

[7] Appendix B, 385.

[8] Appendix B, 314.

[9] Dan Bertolet, *The Mean Musical Chairs of Rising Rent and Home Prices*, Sightline Institute (Mar. 14, 2018), https://www.sightline.org/2018/03/14/infographic-the-mean-musical-chairs-of-rising-rent-and-home-prices/

landlords, the single-family units and small multiplexes are likely to be purchased for personal use.

In the Audit, 1424 landlords, representing 7,677 rental units, or 33.53% of respondents, said they had or would leave the rental market because of FIT. Of those 1424 landlords leaving the market, only 82 of them manage a property of greater[10] than one unit.[11] This shows that small scale landlords are removing their rentals from the market because of FIT at an alarming rate. FIT is limiting the range of housing options by driving small landlords to sell or raise rent which cannot help but aggravate the housing shortage- the opposite effect sought by proponents of the ordinance.

i. When Single-Family Rentals or Small Multiplexes Are Sold By Landlords, They Are Likely to be Purchased for Personal Use Rather Than Rentals.

The evidence below shows that the cost of FIT is most challenging for small, non-professional landlords. The units these landlords sell are likely to be bought for personal use rather than renting, taking them completely out of the rental market.

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[10] The data collected in the Audit segmented respondents by subcategories of landlords. The audit did not segment by how many units respondents managed total, so data is indirect on that strata of landlords. However, 96.41% of respondents whose largest property was one unit, managed 4 or fewer properties. *See* Appendix B at 82. Because of this strong relationship between properties of only one unit and small-scale landlords, that is the category on which *amicus* relies to show the impact on landlords who are not the stereotypical big landowner.

[11] Appendix B, 428.

FIT is most challenging for non-professional landlords. In a focus group described in the Audit, one landlord stated "I think the City Council is basically pushing toward [the perspective of large landlords]. Some of us come from the old school … and [work to] build community. There's a very personal perspective to that…"[12] (modifications in original). Implementing systems to prove time of delivery for applications, designing compliant criteria while still getting tenants who will fulfill their obligations, and advertising the rental in a way that satisfies SMC § 14.08 all take time and money. Inexperienced landlords will need to ask an attorney for advice. This disproportionate cost will lead to a decrease in the supply of affordable rentals, both because of landlords leaving the market and rent becoming unaffordable because of the increased rent needed to cover compliance costs.

Although the Audit shows that landlords in every category are considering selling or have sold their rental property in response to FIT, the net loss to the rental market will be the greatest in single family and small building rentals. While big, 20+ unit buildings are highly unlikely to be

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[12] Office of City Auditor, City of Seattle, UNIVERSITY OF WASHINGTON SEATTLE RENTAL HOUSING STUDY FINAL REPORT, APPENDIX A 9 (2018) *available at* https://www.seattle.gov/Documents/Departments/CityAuditor/auditreports/UWSRHSAppA.pdf

taken out of the rental stock, the smaller homes with any green space, such as townhomes or courtyard condos, are likely to move into private use.

The demand for single-family homes for personal use is astronomical in Seattle.[13] Even though home values have skyrocketed, many owners are reluctant to sell because new homes they would deem "better" are not available to upgrade into.[14] Much of the demand is driven by millennial homebuyers, seeking to have personal homes.[15] The number of households has steadily increased in Seattle since 2010, while the inventory of homes for sale in the same timeframe has fallen by more than 65%.[16] In spite of the incredibly low supply-to-demand ratio, homeownership rates have actually increased, showing that the influx of high paying jobs has brought more wealthy, non-landlords to occupy homes that may have previously been rentals.[17]

While the purchases will satisfy some of the demand for rental housing, taking competitors who can afford to buy out of the market only

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[13] Kathryn Vasel, *It's Really Tough to be a Homebuyer in Seattle*, CNN Money (May 16, 2018), https://money.cnn.com/2018/05/16/pf/buying-a-home-seattle/index.html
[14] *Id.*
[15] Herb Weisbaum, *Who's Powering the Housing Market? Surprise! It's Millennials*, NBC News (Jun. 5, 2017), https://www.nbcnews.com/business/real-estate/who-s-powering-housing-market-surprise-it-s-millennials-n768196
[16] Joint Center for Housing Studies of Harvard University, THE STATE OF THE NATION'S HOUSING 2017, ("HARVARD") 9 (2017) *available at* http://www.jchs.harvard.edu/sites/default/files/harvard_jchs_state_of_the_nations_housing_2017.pdf
[17] *Id* at 19.

relieves pressure on high-end apartments, as those who can move into homeownership are unlikely to be competing for inexpensive housing. By forcing small-scale landlords out of the market, FIT is decreasing the supply of affordable rentals

ii. Small Rentals, Managed by Small-Scale Landlords, Are Less Likely to Increase Rent, Making FIT's Unintended Consequences Even More Far Reaching.

Small-scale landlords provide a necessary tier of affordable homes. Smaller buildings meet the needs of renters not able or willing to rent in new developments. As explained below, new construction tends to be focused around large, multifamily structures. This might explain why the oldest units in the occupied rental stock are buildings with 2-4 units, closely followed by detached, single-family homes.[18] 34% of the Greater Seattle-Tacoma Area's rental stock is either Single-Family or in buildings of less than 4 units.[19] Without the burden of recent construction costs, these older, small buildings tend[20] to have a consistently high percentage of affordable housing.[21]

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[18] *Id* at 15.
[19] Appendix to HARVARD, *supra* note 14, Available at http://www.jchs.harvard.edu/ARH_2017_rental_units_by_structure
[20] This statistic is based on national data, as clarified in the article cited in support.
[21] *See* HARVARD, *supra* note 14, at 3.

In Seattle, landlords whose largest property was just a single unit[22] were the least likely group to increase rent in the past year. 44% of landlords managing single-unit properties did not increase their rent at all in the last year, with 30% increasing by only 1% to 5%.[23] Only 15% of landlords managing buildings of 20 or more units could say the same thing.[24] The most likely group to raise rent was professional[25] landlords who managed property in 6 or more buildings.[26]

This reluctance to increase rent may be driven by the personal relationship that a non-professional landlord can develop with a tenant. In the landlord focus groups, conducted to fulfill Audit requirements, some landlords mentioned long-term relationships with renters that led the landlords to choose less economically advantageous actions as a way to protect their tenant.[27] Pushing all landlords to operate as professional property managers[28] takes this personal relationship out of the equation and forces tenants to deal exclusively with the group of landlords who have been proven by the Audit to most commonly raise rents.

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[22] Or non-professional landlords, *see, supra*, note 10.
[23] Audit, 232.
[24] *Id.*
[25] As explained above, the data was not always segmented in a way that was useful for this analysis. Landlords managing property in 6 or more buildings were most likely to treat the rental as primary income, *see* Appendix B at 67, and therefore are treated as professional landlords here.
[26] Appendix B at 236.
[27] Audit at 12-13.
[28] Audit at 12.

iii. **Large, New Developments Cannot Fill the Gap Left by Non-Professional Landlords Because the High Cost of Construction Drives Up Rental Costs.**

FIT is decreasing the supply of small, private rentals and forcing applicants to look to other housing options, such as large multi-family rentals. The existing supply is insufficient, so it is necessary to review how that supply can be augmented. Although any increase in supply of housing relieves some of the scarcity problem,[29] new high-rises are no substitute for single-family homes rented out by non-professional landlords. The increased demand for rental housing among those who could purchase homes if they chose has changed the profile of the average renter. Also, a labor shortage and regulatory costs have driven up the cost of construction, making high rents necessary to justify the initial investment in the construction.

Ever since the housing market crash in 2008, renting has had greater appeal for households that could afford to buy homes if they desired.[30] Between 2006 and 2016, the percent of households earning $100,000 or more who were renting their homes increased by 150%.[31] This demand shift has caused developers and investors to concentrate on building high end,

[29] *See* Bertolet, *supra* note 9.
[30] *See* HARVARD, *supra* note 14 at 1.
[31] *Id.*

multi-family apartments that cost more than the median renter can afford.[32] In spite of the increased demand for high end rentals, renting remains the primary housing option for those with the least means. Soaring demand and steadier profits for rentals targeted at higher-income households has not translated to an increased supply of moderate to lower-cost housing.[33]

Relatedly, as the cost of housing has increased, the percent of property owners opting to renovate rather than construct new property has created a very tight labor market for skilled builders. Renovation is more time and labor intensive than comparable use new construction, causing a shortage of labor available to build new construction, which in turn causes the cost of the construction to rise.[34] When housing prices rise, two things happen: the pool of potential home buyers becomes more select and the cost of living for laborers increases. The increased cost of living for laborers drives up construction costs, starting the cycle over again.[35] This creates a vicious cycle in which tight labor markets exert constant upward pressure on the cost of housing.

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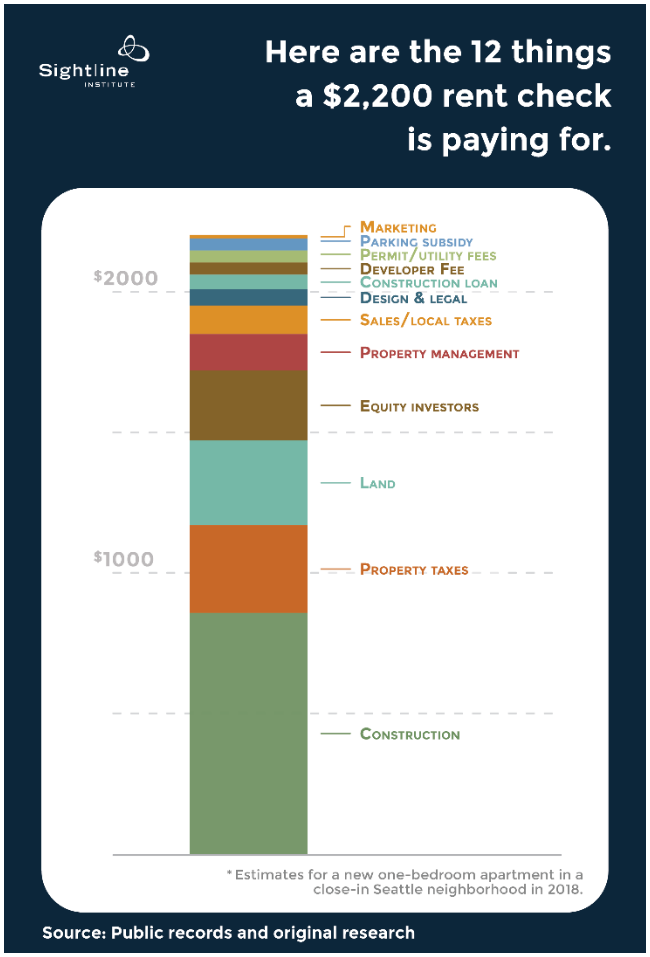
[32] *Id* at 2.
[33] *Id.*
[34] Issi Romem, *What's Up With Construction Costs?*, BuildZoom (Dec. 17, 2018), https://www.buildzoom.com/blog/whats-up-with-construction-costs.
[35] *Id.*

Finally, the rent in new buildings is inextricably tied to the cost of construction. Sightline Institute recently analyzed rent checks in Seattle to show what the dollars tenants paid were funding.[36]



The physical construction cost represents 39% of the rent check. This does not include the land purchase (13.7%), real estate and sales taxes on construction materials (4.6%), building professionals such as architects and engineers (2.6%), and construction loan interest (2.4%). Total, unavoidable construction costs account for 62.3% of a Seattleites rent check.[37] For a typical $2,200 rent check, that puts bare construction cost at

[36] Dan Bertolet, *Why's the Rent So High for New Apartments in Seattle?*, Sightline Institute (Nov. 4, 2018), https://www.sightline.org/2018/11/05/whys-the-rent-so-high-for-new-apartments-in-seattle/.
[37] This assumes the financiers required a yield-on-cost rate of 5.8% per year. The current market appears to be accepting yields of 5.2% to 5.6% per year. *Id*.

$1,370.60. In contrast, the median monthly income for renters in the bottom quartile is $1,100.[38] Even if the bare construction cost was the total rent charged, anyone making less than $50,000 would be spending more than a third of their income on rent. New construction is flatly out of reach for the disadvantaged.

FIT is forcing out non-professional landlords who primarily manage existing structures. They own and rent out less expensive, older housing that is accessible to less affluent consumers. New construction is increasingly focused on building multifamily structures. In 2016, 83% of completed rental structures contained 20 or more units, an increase of 29% since 2001. In contrast, single-family rentals added to the market over the same period were almost exclusively own-to-rent conversions.[39] Property owners can rent out these pre-existing homes at lower rates because they are not burdened with the construction costs which drive the cost of new, multifamily buildings. In short, FIT has had the unintended consequence of driving smaller scale landlords out of the rental market, thereby increasing costs.

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[38] *See* HARVARD, *supra* note 14 at 26.
[39] *Id* at 17.

V. CONCLUSION

In conclusion, this Court should affirm the trial court's ruling. The City's legal and policy justifications are insufficient. The legal argument requires overturning decades-old existing precedent. The policy argument ignores the unintended consequences of regulatory scarcity.

To side with City would undermine core principles of property ownership and allow regulation that makes homeowners less inclined to build a new home or remodel an existing home in a manner that makes it suitable to rent. This would only serve to make a bad problem worse.

FIT does not cure the problem it claims to solve, undermining the City's claim that FIT has a substantial relationship to public welfare and that it causes no economic harm. The City knows that FIT, no matter how well-intentioned, will not work. A Seattle Housing Affordability and Livability Agenda Project Manager announced the clear problem herself: "When housing choices are limited, the wealthy always win."[40] FIT is limiting housing choices by driving up rental qualifications and driving out non-professional landlords, creating an environment where housing is only available to a few.

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[40] Serena Larkin, *When Housing Choices Are Limited the Wealthy Always Win*, Sightline Institute (Jul. 7, 2016), https://www.sightline.org/2016/07/07/when-housing-choices-are-limited-the-wealthy-always-win, (quoting Sara Maxana, HALA Project Manager for the City of Seattle).

This Court should affirm.

Respectfully submitted this 7 day of March, 2019,

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