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Case No. 76310-5

No. 96538-2

IN THE COURT OF APPEALS, DIVISION I
STATE OF WASHINGTON

STATE OF WASHINGTON, WASHINGTON STATE DEPARTMENT
OF TRANSPORTATION; DANIEL A. SLIGH and SALLETTE R.
SLIGH, individually and the marital community composed thereof;
BRYCE KENNING, a single person,

Respondents,

v.

MULLEN TRUCKING 2005, LTD, a Canadian corporation or business
entity d/b/a MULLEN TRUCKING LP; WILLIAM SCOTT and JANE
DOE SCOTT, individually and the marital community composed thereof;
SAXON ENERGY SERVICES, INC.; TAMMY J. DETRAY and
GREGORY S. DETRAY, individually and the marital community
composed thereof; G&T CRAWLERS SERVICE, a Washington business
entity; MOTORWAYS TRANSPORT, LTD a Canadian corporation;
AMANDEEP SIDHU and JANE DOE SIDHU, individually and the
marital community composed thereof,

Appellants.

BRIEF OF APPELLANT MOTORWAYS TRANSPORT, LTD

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A. INTRODUCTION

Motorways Transport Ltd., Amandeep Sidhu, and Jane Doe Sidhu (collectively, the “Motorways Defendants”) submit the following Brief contesting the lower court’s ruling that RCW 46.44.020, not RCW 4.22.070, applies for purposes of determining the defendants’ fault in the underlying case.

RCW 46.44.020 does not apply here. The statute is intended to protect the State from lawsuits by other entities arising out of collisions with certain structures over roadways. The defendants are not suing the State for damages from the Skagit River Bridge strike. The State is suing the defendants. The State cannot use RCW 46.44.020 as a means of obtaining damages from private parties

If the Court determines that RCW 46.44.020 does apply, the statute still does not supplant RCW 4.22.070. “Liability” under RCW 46.44.020 is not synonymous with “fault” under RCW 4.22.070. In turn, even though the State cannot be held “liable” for the bridge strike as an immune party, its “fault” (if any) is allocated under RCW 4.22.070. In turn, the State’s total recovery can and should be reduced by its own proportionate wrongdoing.

B. STATEMENT OF ISSUES

1. Does RCW 46.44.020 apply where the State is seeking damages from another party?
2. If RCW 46.44.020 applies and the State is immune from liability, is the State's fault allocated pursuant to RCW 4.22.070?
3. Does RCW 46.44.020 apply to Motorways where Motorways did not strike or otherwise impact the Skagit River Bridge?

C. STATEMENT OF THE CASE

This matter arises out of the Skagit River Bridge collapse that occurred on May 23, 2013, when Mullen's oversize load vehicle impacted the overhead trusses of the bridge while it was driving southbound in the right hand lane. The matter before this Court is whether the State can be held contributorily negligent for the accident.

On December 15, 2016, the Superior Court granted the State's Motion for Partial Summary Judgment regarding immunity from liability. The Court held as follows:

[T]he amount of WSDOT's recovery in this matter may not be reduced by WSDOT's degree of fault in causing the subject bridge collapse, if any; and defendants' collective liability to WSDOT, if any, may not be diminished by any finding of fault on WSDOT's part in causing the subject bridge collapse. RCW 46.44.020 provides in pertinent part that "no liability may attach to the state ... by reason of any damage or injury to persons or property by reason of the existence of any structure over or across any public highway where the vertical clearance above the roadway is fourteen feet or more..." The Court interprets this statute to ensure that the State shall not be held liable for any of the proven

damages in the event of a strike to a bridge over fourteen feet high regardless of whether its own fault contributed to the strike.

CP 1220-1224

The trial court held that pursuant to RCW 46.44.020, the State could not be liable for any of the damages caused by the bridge strike, regardless of whether the State's own fault contributed to the strike.

On December 20, 2016, Mullen filed a Motion for Certification to the Court of Appeals for Interlocutory Review pursuant to RAP 2.3(b)(4). CP 1320-1325. Under RAP 2.3(b)(4), review may be accepted where the trial court certifies that its decision "involves a controlling question of law as to which there is substantial ground for a difference of opinion and that immediate review of the order may materially advance the ultimate termination of the litigation." RAP 2.3(b)(4).

On January 23, 2017, the Superior Court granted Mullen's Motion and certified the decision for review pursuant to RAP 2.3(b)(4). CP 1354-1359. The Superior Court stated that clarification from the Court of Appeals would reduce the possibility of a second trial should an appeal follow trial as to whether the jury should have been instructed regarding the State's potential contributory negligence.

Mullen filed its Motion for Discretionary Review on January 24, 2017. The Commissioner denied review on April 24, 2017, stating Mullen

had failed to show immediate review would materially advance the ultimate termination of the litigation. The Commissioner said that regardless of the outcome on the allocation of fault issue, a trial was still necessary to determine the negligence of each defendant.

Mullen filed a Motion to Modify on May 18, 2017, claiming that a retrial would eventually be required if interlocutory review was not granted. Mullen framed the issue as follows:

The underlying issue is whether "liability," as used in RCW 46.44.020, is synonymous with "fault," such that not only may the State not be held "liable" for the results of a bridge strike, it may not even be ascribed "fault" for it under RCW 4.22.070. Whether the State's "fault" may be considered in an RCW 4.22.070 analysis determines whether (1) the State's recovery, if any, may be reduced by its own proportionate wrongdoing, and (2) whether joint and several liability attaches to defendants.

In its Response, the State argued that RCW 4.22.070 does not apply because RCW 46.44.020 is the more specific statute and is therefore controlling.

RCW 46.44.020 eliminates any need to determine WSDOT's fault because, as a matter of law, "no liability may attach to the state" for "any damage or injury to persons or property" caused by Mullen's overhead bridge crash. Because, as the trial court correctly ruled, "no liability or financial responsibility" can be attributed to WSDOT, a determination of WSDOT's "fault" under RCW 4.22.070 is neither required nor permitted.

Mullen argued in its Reply that RCW 46.44.020 is ambiguous, that there is a conflict between RCW 46.44.020 and RCW 4.22.070, and that this conflict is an issue of first impression for the appellate court to decide.

Mullen also argued that RCW 46.44.020 is applicable in circumstances where the State is *being sued* for damages to property as a result of a bridge collision; not, as here, where the State is *suing* to recover its own damages. Mullen claims this would erroneously “allow the State to use RCW 46.44.020 as both a shield from liability for its wrongdoing and a sword against fundamental comparative fault defenses.”

On June 23, 2017, the Court of Appeals granted the Motion to Modify and accepted review of the appeal.

D. ARGUMENT

1. Motorways Can Join in this Appeal Under the Rules of Appellate Procedure

Motorways did not file a notice of appeal of the lower court’s December 15, 2016, Order granting the State’s Motion for Partial Summary Judgment regarding immunity from liability. However, Motorways is permitted to join in this appeal because it has shared issues with Mullen under RAP 10.1(g), and its rights and duties are directly dependent on a determination of these shared issues pursuant to RAP 5.3(i).

a. Motorways Can File a Separate Brief under RAP 10.1(g)

RAP 10.1(g) states that in a case with more than one party to a side, a party may (1) join with one or more other parties in a single brief, or (2) file a separate brief and adopt by reference any part of the brief of another. RAP 10.1(g). The rule is intended to facilitate shared briefing related to shared issues. *C.J.C. v. Corp. of the Catholic Bishop*, 138 Wn.2d 699, 728 (1999).

Motorways and Mullen have shared issues on this appeal. Both parties are directly affected by whether the State can be found contributorily negligent for the collapse of the Skagit River Bridge. Any portion of the \$17 million bridge repair for which the State is deemed responsible reduces Mullen and Motorways' portions of responsibility. Given its shared issues with Mullen, Motorways is entitled to file this brief pursuant to RAP 10.1(g), and adopts by reference sections V(3)–(5) of Mullen's Brief of Appellant.

b. Motorways Can Join in this Appeal Pursuant to RAP 5.3(i)

Under RAP 5.3(i):

If there are multiple parties on a side of a case and fewer than all of the parties on that side of the case timely file a notice of appeal or notice for discretionary review, the appellate court will grant relief only...to a party if demanded by the necessities of the case. The appellate court will permit the joinder on review of a party who did not give notice only if the party's rights or duties are derived through the rights or duties of a

party who timely filed a notice *or* if the party's rights or duties are dependent upon the appellate court determination of the rights or duties of a party who timely filed a notice.

RAP 5.3(i) (emphasis added)

Even if the absent party did not formally request permission to be joined, “the rule should be liberally construed to allow the court to grant relief under the circumstances described in the case law.” *Genie Indus., Inc. v. Market Trans., Ltd.*, 138 Wn. App. 694, 707-16 (2007) (quoting 2A Karl B. Tegland, *Washington Practice: Rules Practice RAP 5.3*, author’s cmt. 10 at 477-478 (6th ed. 2004)).

The “necessities of the case” standard is met where the issue being appealed will necessarily decide the rights or duties of the non-appealing party. This type of situation is exemplified where, as here, (1) the court enters judgment against codefendants having joint rights or duties concerning the same sum of money; (2) only one codefendant appeals; (3) the appealing codefendant obtains reversal on appeal; (4) but, by operation of law, the reversal would not change the status quo of the plaintiff/respondent unless the appellate court makes the reversal effective in favor of both the appealing and non-appealing defendants. *Genie Indus.*, at 708-9.

Motorways’ rights and duties are directly dependent on the determination of the rights and duties of the other parties in this appeal. If

the State's fault is considered under RCW 4.22.070, Motorways and Mullen will only be responsible for their own portions of fault (if any). If the State's fault is not considered under RCW 4.22.070, Motorways and Mullen will also be responsible for the portion of fault the State would otherwise have been responsible for. In turn, the Court is necessarily deciding the rights and duties of Motorways in the present appeal. It cannot come to a decision regarding apportionment of the State and Mullen's fault without also deciding Motorways' fault. In turn, Motorways' briefing should be considered under RAP 5.3(i).

2. RCW 46.44.020 Does Not Apply Because the State is Not Being Sued

Under RCW 46.44.020, "no liability may attach to the state ... by reason of any damage or injury to persons or property by reason of the existence of any structure over or across any public highway where the vertical clearance above the roadway is fourteen feet or more..." RCW 46.44.020.

RCW 46.44.020 does not apply in the present case because the State is *suing* to recover damages to its own property rather than *being sued* for damages to someone else's property. Mullen is not seeking recovery from the State for the damage to its truck. The State is seeking to recover from Mullen for the damage to the bridge. As Mullen has

correctly pointed out, RCW 46.44.020 is meant to be used as a shield to protect the State from lawsuits filed against it. It is not meant to be used as a sword for the State to seek damages from private citizens. In turn, the State is not immune under RCW 46.44.020. It can be held liable to the extent its alleged failure to post signage for vertical clearance contributed to the bridge strike.

3. Even if RCW 46.44.020 Applies, It Does Not Conflict with RCW 4.22.070, and Both Statutes Are Given Meaning

The State attempts to argue that RCW 46.44.020 and RCW 4.22.070 conflict and, therefore, RCW 46.44.020 controls because it is the more specific statute. In turn, the State claims that if it is immune under RCW 46.44.020, it cannot be apportioned fault under RCW 4.22.070. The State's interpretation of the statutes is incorrect for multiple reasons.

a. The Statutes Can be Harmonized

The State argues that under the general-specific rule of statutory construction, only RCW 46.44.020 applies. However, this erroneously assumes that RCW 46.44.020 and RCW 4.22.070 conflict to begin with.

Before applying the general-specific rule, the court must identify a conflict between the relevant statutes that cannot be resolved or harmonized by reading the plain statutory language in context. *Univ. of Wash. v. City of Seattle*, 188 Wn.2d 823, 832-33 (2017) (citing *Residents*

Opposed to Kittitas Turbines v. State Energy Facility Site Eval. Council, 165 Wn.2d 275, 309-10 (2008)). Only when a conflict is presented, does the more specific statute prevail. *Id.*

Even if two statutes seem to conflict, “it is the duty of the court to reconcile apparently conflicting statutes and to give effect to each of them, if this can be achieved without distortion of the language used.” *State ex rel. Royal v. Bd. of Yakima County Comm'rs*, 123 Wn.2d 451, 459-60 (1994) (emphasis added) (quoting *Tommy P. v. Bd. of County Comm'rs*, 97 Wn.2d 385, 391-92 (1982)).

In the present case, the general specific rule does not apply because there is no conflict between RCW 46.44.020 and RCW 4.22.070. RCW 4.22.070 provides that *fault* will be allocated to and between every entity and party that caused the damage, including immune parties.¹ Washington courts have consistently held that immune parties cannot be held *liable*

¹ “Immunity” is not specifically defined in the Tort Reform Act. For purposes of statutory construction, words are given their plain and ordinary meaning unless a contrary intent is evidenced in the statute. *In re Estate of Blessing*, 174 Wn.2d 228, 231 (2012). When a statutory term is undefined, the court may look to a dictionary for its ordinary meaning. *Id.* “Immunity” is defined in relevant part as “[a]ny exemption from a duty, *liability*, or service of process...” Black’s Law Dictionary (10th ed. 2014) (emphasis added).

under RCW 4.22.070. If the immune party is at *fault*, its portion of the fault is allocated but it is not recoverable as damages.²

RCW 46.44.020 provides that “no *liability* may attach to the state...by reason of any damage or injury to persons or property by reason of the existence of any structure over or across any public highway...” RCW 46.44.020 (emphasis added). RCW 46.44.020 does not address fault.

The two statutes are easily harmonized by a plain reading of the statutory language in context. Under RCW 46.44.020, no liability may attach to the State as an immune party. Under RCW 4.22.070, fault can be allocated to immune parties, but liability cannot. Both statutes preclude *liability* from attaching to immune parties. In turn, the statutes do not conflict and meaning should be given to both. The general-specific rule of statutory construction does not apply.

4. The State’s Fault Must be Apportioned under RCW 4.22.070, But the State’s Fault is Not Recoverable as Damages Because the State is an Immune Party

RCW 46.44.020 only grants the State immunity from liability for damage from vertical clearance accidents. It does not address fault.

² Under RCW 4.22.070, immune entities are protected from liability but their portion of fault is still allocated. *Humes v. Fritz Companies, Inc.*, 125 Wn. App. 477 (2005); *Washburn v. Beatt Equipment Co.*, 120 Wn.2d 246, 294 (1992).

Therefore, even if the State is immune from liability, its fault can still be apportioned under RCW 4.22.070.

In *Humes v. Fritz Companies*, supra, a crane operator sued a truck driver and the trucking company for an accident that occurred on Indian reservation land. The tribe was not named as a defendant. *Id.* at 481-82. The issue before the Court was whether fault could be attributed to the tribe despite its sovereign immunity. The Court held that while immune entities are protected from *liability*, their portion of *fault* is still allocated because the plaintiff is not allowed to recover more from a defendant than the defendant's proportionate share of damages under RCW 4.22.070(1). *Id.* at 491.

Under Washington tort law, fault will be attributed to every entity that caused a plaintiff's injury, including entities that are immune to a suit from a plaintiff. RCW 4.22.070(1). The statute evidences an intent by the legislature that entities such as the...*defendants pay only their own proportionate share of damages*. The statute also clarifies that a plaintiff such as Humes should not recover for fault attributable to immune parties.

Humes, 125 Wn. App. at 490-91 (citing *Washburn*, 120 Wn.2d at 294) (emphasis added).

In the present case, the State's portion of fault for the accident is allocated under RCW 4.22.070, but damages from that fault are not recoverable.

This interpretation is in keeping with the legislative intent under the Tort Reform Act. “The statute [RCW 4.22.070] evidences legislative intent that fault be apportioned and that generally an entity be required to pay that entity’s proportionate share of damages only.” *Washburn*, 120 Wn.2d at 294. “The statute also evidences legislative intent that certain entities’ share of fault not be at all *recoverable* by a plaintiff; for example, the proportionate shares of *immune* parties.” *Id.* at 294 (emphasis added).

The Court in *Washburn* specifies that although an immune entity’s fault can be allocated, damages for that fault are not *recoverable*. Hence, even if the State is an immune party, it cannot recover damages for the fault attributed to it.

5. RCW 46.44.020 does not apply to Motorways Because Motorways Did Not Strike the Bridge.

Even if the Court determines under RCW 46.44.020 that the State is immune from liability *and* its fault cannot be allocated, this determination would only apply to defendants Mullen and DeTray, not Motorways.

Motorway’s truck did not hit the Bridge, therefore the statute does not apply to it. RCW 46.44.020 renders the State immune from claims for damages caused by impacts with structures having over 14 feet of clearance above roadways. Mullen’s truck was the only vehicle that

impacted the overhead trusses of the Skagit River Bridge. The collision only occurred because Mullen and DeTray failed to research the route, check posted bridge heights, and take other appropriate precautionary measures.

Motorways' truck had plenty of clearance and did not strike any portion of the Bridge. Motorways happened to be in the left-hand lane at the time Mullen's oversize load impacted the Bridge trusses above the right-hand lane.

If RCW 46.44.020 does not apply to Motorways, the State does not have immunity from liability as to Motorways. In turn, any liability attributed to Motorways must be reduced by the State's contributory negligence (if any). In contrast, because the State is immune from liability as to Mullen under RCW 46.44.020, Mullen's liability would *not* be reduced by the State's contributory negligence.

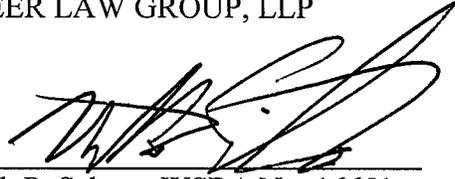
E. CONCLUSION

For the reasons stated herein, Motorways respectfully requests that the Court find, pursuant to RCW 46.44.020 and RCW 4.22.070, that the State's total recovery as against Motorways can and should be reduced by the State's own proportionate wrongdoing.

RESPECTFULLY SUBMITTED this 6th day of November, 2017.

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By

A handwritten signature in black ink, appearing to be 'M. P. Scheer', written over a horizontal line.

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CERTIFICATE OF SERVICE

I certify under penalty of perjury under the laws of the State of Washington, that the following is true and correct:

I am employed by the law firm of Scheer Law Group LLP.

At all times hereinafter mentioned, I was and am a citizen of the United States of America, a resident of the State of Washington, over the age of eighteen (18) years, not a party to the above-entitled action, and competent to be a witness herein.

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