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SUPREME COURT
STATE OF WASHINGTON
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CLERK

No. 98221-0

IN THE SUPREME COURT
OF THE STATE OF WASHINGTON

MARIA JESUS SARALEGUI BLANCO,

Petitioner,

v.

ERNESTO HERNANDEZ,
TERI HERNANDEZ
and the marital community comprised thereof,

Respondents,

and

DAVID GONZALEZ SANDOVAL,
ALEXANDRA BARAJAS GONZALEZ, and the marital community comprised thereof,

Defendants.

PETITIONER'S REPLY TO RESPONDENTS' ANSWER TO MOTION FOR DISCRETIONARY REVIEW

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Petitioner MARIA JESUS SARALEGUI BLANCO

Replies to Respondents' Answer to her Motion for Discretionary Review as follows:

1. <u>The Superior Court committed probable error under RAP 2.3 (b) (2) by disregarding *Oliver* regarding the pit bull and by disregarding the landlords' responsibility for the defective fence under *Degel*</u>

Respondents ignore relevant law and material facts in their argument that "mere land ownership" does not give rise to a landlord's liability for a tenant's dangerous dog.[1] Respondents cite *Clemons*, *Shafer*, and *Frobig* for this proposition.[2] As discussed in Ms. Blanco's Motion, the *Frobig* line of cases conflict with premises liability law as described in *Oliver v. Cook*, 194 Wn. App. 532, 377 P.3d 265 (Div. 2, 2016) and *Degel v. Majestic Mobile Manor, Inc.*, 129 Wn.2d 43, 51, 914 P.2d 728 (1996).

In *Frobig*, this Court found the landlord defendants were not responsible for injuries resulting from a tiger attack that occurred on their premises while their tenants were using the tiger in filming a commercial. Similar results were found by Division 1 in *Shafer v. Beyers*, 26 Wn. App. 442, 446–47, 613 P.2d 554 (1980) (no liability for landlord who briefly saw dog on premises two or three days prior to the plaintiff's injury) and by Division 2 in *Clemmons v. Fidler*, 58 Wn. App. 32, 791 P.2d 257 (Div. 2,

[1] Resp. to Motion for Disc. Review, Page 6
[2] Id. *citing Clemmons v. Fidler*, 58 Wn. App. 32, 791 P.2d 257 (Div. 2, 1990), *Shafer v. Beyers*, 26 Wn. App. 442, 446–47, 613 P.2d 554 (1980), and *Frobig v. Gordon*, 124 Wn.2d 732, 881 P.2d 226 (1994)

1990) (no liability for landlord despite evidence supporting claims that landlord had prior knowledge the dog was vicious.)

In *Oliver*, Division 2 found court found that the landlord, defendant Eugene Mero, owed duties of a possessor of land to the plaintiff, Steven Oliver, who was an invitee on premises, and that dog owned by tenant and co-defendant Henry Cook was a condition of the land. *Oliver*, 194 Wn. App. at 544. ("Here, [the dog] Scrappy is the relevant 'condition' on the land.") The *Oliver* court discussed both *Frobig* and *Shafer* and found they were dispositive only of strict liability claims, and that a separate analysis was required for premises liability theories. The *Oliver* court distinguished *Frobig* and *Shafer*, finding that "strict liability is not the only cause of action for a dog bite" and that there is <u>no</u> "dog bite exception to ordinary premises liability rules." *Oliver v. Cook*, 194 Wn. App. at 545 (emphasis added).

In *Degel*, this Court found the mobile home park owner could be liable for failing to put a fence between a play area and the creek in which the plaintiff child suffered catastrophic injuries from a near-drowning. This Court found "We have never recognized a 'natural bodies of water doctrine' applicable to all premises liabilities actions." *Degel v. Majestic Mobile Manor, Inc.*, 129 Wn.2d 43, 51, 914 P.2d 728 (1996).

Factually, Respondents and the Superior Court ignored the importance of the chewed and weathered fence that failed to contain the pit bull. Respondent Ernesto Hernandez knew about the pit bull and approved of his Mr. Sandoval keeping it on the property. Mr. Hernandez also regularly inspected the property and knew or should have known about the poor condition of the fence, which had been erected, with his permission, specifically to contain the pit bull. These facts establish more than "mere land ownership." Under ordinary premises liability rules, Respondents owe duties to Ms. Blanco as either an invitee or a licensee to protect her from the pit bull escaping from the fence or to warn her that the fence could not hold the dog. *See Iwai v. State*, 129 Wn.2d 84, 93–94, 915 P.2d 1089 (1996) (*quoting* Restatement (Second) of Torts § 343 (1965) (duties to invitee); See *Tincani v. Inland Empire Zoological Soc.*, 124 Wn.2d 121, 133, 128, 875 P.2d 621 (1994) (*quoting* Restatement (Second) of Torts § 342 (1965) (duties to licensee).

Respondents incorrectly assert that provisions of the Residential Landlord Tenant Act support the proposition that "a landlord is under no duty to repair a defective condition caused by a tenant."[3] RCW 59.18.130 provides statutory duties owed by the tenant to the landlord, including a duty to "pay the rental amount at such times and in such amounts as provided for in the rental

[3] Resp. to Motion for Disc. Review, Page 6

agreement." RCW 59.18.130. Nothing in the statute precludes or limits any duties to third parties on the property. Likewise, RCW 59.18.060 establishes statutory duties owed by the tenant to the landlord, and does not limit or preclude a landlord's liability to third parties. The disclaimer of duty in RCW 59.18.060 is not absolute as Respondents represent it to be. It is a very specific disclaimer that applies only to the tenant for damage to the property caused by the tenant:

> No duty shall devolve upon the landlord to repair a defective condition under this section, **nor shall any defense or remedy be available to the tenant** under this chapter, where the defective condition complained of was caused by the conduct of such tenant …

RCW 59.18.060 (15). This does not affect any duty owed by the landlord or the tenant to third parties.

2. The Superior Court committed obvious or probable error under by denying Ms. Blanco's Motion to Certify under RAP 2.3 (b) (4)

RAP 2.3(b)(4) provides for discretionary review where:

> The superior court has certified … that the order 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). As described above and as previously briefed, there is a substantial ground for a difference of opinion as to whether Respondents owed premises duties to Ms. Blanco under *Oliver* and *Degel*, or whether there is a dog bite exception to

ordinary premises liability rules under *Frobig* that would absolve Respondents of any responsibility for the defective fence as well as the dog.

As set forth in Ms. Blanco's opening brief and Statement of Grounds, it is obvious that immediate review of the dismissal of Ms. Blanco's claims against the landlord Respondents will materially advance the ultimate termination of the litigation. Since the remaining defendant dog owners are insolvent and uninsured, for Ms. Blanco to have any hope of recovery, there is no other choice but to seek appellate review of the summary judgment dismissal of the Respondent landlords. Supreme Court review in particular is appropriate to address the conflicts between *Oliver* and *Frobig*, as discussed above. Under the Superior Court's denial of Ms. Blanco's Motion to Certify, she would be forced to proceed to trial against the insolvent and uninsured dog-owner defendants, who would likely proceed *pro se*, to obtain a purely symbolic result in order to obtain a final judgment from which she could appeal as a matter of right. Review of this matter would materially advance the ultimate termination of the litigation, as this needless trial would be avoided. The Superior Court's denial of Ms. Blanco's motion was obvious, or at least probable, error.[4]

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[4] Respondents contend the four-month delay in the Superior Court's ruling, which Respondents describe as "slight" did not prejudice Ms. Blanco. Resp. to Motion for Disc. Review, Page 8. The Superior Court did not rule on Ms. Blanco's motion for reconsideration within the 30-day timeframe of CR 59 (b)

Recent developments regarding the COVID-19 outbreak make it more imperative for a needless trial to be avoided. This Court has suspended all civil jury trials until April 24, 2020 with other restrictions upon motions and other proceedings.[5] Snohomish County Superior Court ordered that "civil jury trials are SUSPENDED until at least June 1, 2020."[6] These suspensions may be extended even further depending on further developments in containment of the outbreak. When normal court operations and trials resume, there will be a large backlog of cases to be docketed for trial. Ms. Blanco does not contend the Superior Court should have foreseen the COVID-19 outbreak. A delay caused by court calendar oversight is in and of itself particularly prejudicial to a plaintiff of advanced age. Such prejudice is typically illustrated by more common perils such as fading memories and unavailability of witnesses, but there always exists some level of risk of national and local emergencies such as earthquakes and other natural disasters, wars and terrorist attacks, riots and strikes, and in this case, pandemics. The COVID-19 outbreak enhances the need for review at this time in order to avoid further burdening the Superior Court with an unnecessary and pointless trial.

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and did not consider Ms. Blanco's advanced age under RCW 4.44.025. This may implicate RAP 2.3(b)(3).

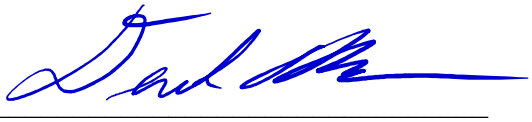
[5] Supreme Court of Washington Order No. 25700-B-607, as amended. (In the Matter of Statewide Response by Washington State Courts to the COVID-19 Public Health Emergency.)

[6] Snohomish County Superior Court Emergency Order #5 Re: Court Operations, No. 2020-7007-31A, Page 2 (All caps in original) (Attached as Reply App. 1)

1. Conclusion

Through no fault of her own, Ms. Blanco was viciously attacked by a pit bull on Respondents' property. Respondents knew the pit bull was on the property, knew or should have known that the weathered and chewed fence was insufficient to contain the animal, yet did nothing to protect the public. Since the remaining defendants are insolvent and uninsured, appellate review is inevitable. Nothing would be served by forcing her to try her case against the insolvent defendants in order to obtain review as a matter of right. The Superior Court committed obvious error when it ruled otherwise. Due to the conflict between *Oliver* and *Frobig*, which can only be resolved by this Court, Supreme Court review is appropriate.

Respectfully submitted this 28th day of March, 2020.



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REPLY APPENDIX

1. **Snohomish County Superior Court Emergency Order #5 Re: Court Operations, No. 2020-7007-31A**

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2020 MAR 27 PM 4:16
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COUNTY CLERK
SNOHOMISH CO. WASH

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR SNOHOMISH COUNTY

IN RE THE MATTER OF THE RESPONSE BY SNOHOMISH COUNTY SUPERIOR COURT TO THE PUBLIC HEALTH EMERGENCY IN SNOHOMISH COUNTY AND THE STATE OF WASHINGTON	NO. 2020-7007-31A EMERGENCY ORDER #5 RE: COURT OPERATIONS

WHEREAS on January 31, 2020, the Secretary of Health and Human Services declared a public health emergency under Section 319 of the Public Health Service Act (42 U.S.C. 247d) in response to COVID-19, and

WHEREAS on February 29, 2020, Governor Jay Inslee declared a state of emergency due to the public health emergency posed by the coronavirus 2019 (COVID-19), and

WHEREAS on March 1, 2020, President Donald J. Trump proclaimed that the COVID-19 outbreak in the United States constitutes a national emergency, and

WHEREAS on March 23, 2020, in response to the Covid 19 emergency, Governor Jay Inslee issued a proclamation prohibiting all people in Washington from leaving their homes, except to conduct or participate in essential activities. In complying with the prohibition, lawyers, litigants, and witnesses will be unable to attend court for nonessential hearings unless by means of a system for telephonic or video appearance, and

WHEREAS on March 24, 2020, Snohomish County Executive Dave Somers signed Emergency Executive Order No. 20-04, stating, "all people in Snohomish County shall

immediately cease leaving their home or place of residence except (1) to conduct or participate in essential activity and/or for employment in essential business services," and

WHEREAS obtaining signatures from defendants for orders continuing existing matters places significant burdens on attorneys, particularly public defenders, and all attorneys who must enter correctional facilities to obtain signatures in person, and

NOW THEREFORE, it is hereby ORDERED, pursuant to the authority of Washington State Supreme Court Order No. 25700-B-607 and the authority of the Presiding Judge of the Snohomish County Superior Court, that the following shall be in effect March 30, 2020:

Civil Trial Call

1. All civil jury trials are SUSPENDED until at least June 1, 2020. Any civil case that is currently set for jury trial before then shall be timely confirmed consistent with the confirmation rule in order to receive a new jury trial date. The new date will be after August 31, 2020. Any civil case that is not timely confirmed consistent with the confirmation rule will be stricken. Any party may then file a new note for trial setting. .
2. All timely confirmed civil bench trials, other than those on petitions for domestic violence protective orders, sexual assault protective orders, and extreme risk protective orders will be continued to a new trial date after April 24, 2020. The Court finds exceptional circumstances to continue all dependency fact finding hearings beyond the statutory 75-day period and, at this time, all dependency fact finding hearings shall be continued to the next available date after June 1, 2020.

Criminal Matters

3. All pending criminal trials, whether jury or bench, are SUSPENDED until after April 24, 2020. For all criminal trials suspended under this provision, and all other criminal matters which were previously continued pursuant to any previous emergency order, April 25 will be the new commencement date under CrR 3.3. The Court further finds that the ends of justice and the imperative of safety served by continuing these cases outweighs the defendant's right to a speedy trial. The Court further finds that any delays for time for trial are the result of the unavoidable and unforeseen circumstances and would therefore be excluded from time for trial anyway by CrR3.3(e)(8), pursuant to Paragraph 9 of Supreme Court Order No. 27500-B-607, issued March 20, 2020.
4. Through April 24, 2020, all out-of-custody defendant matters to be heard on the Criminal Hearings Calendars in Department 304 shall be stricken. Out-of-custody defendants need not appear for any criminal trial calendar prior to May 1, 2020. The cases will be called, the non-appearance will be noted. The Court will authorize no bench warrants for failures to appear at any trial calendar occurring in the months of March and April, 2020. For purposes of this order, "defendant" means adult criminal defendant.
5. Beginning March 17, 2020, the only criminal matters heard in C304 apart from trial call on Friday at 1:00 p.m. and all video calendars, will be in-custody arraignments, in-custody CSV matters, in-custody motions to review bail upon proper notice or by agreement of the parties, in-custody pleas, and in-custody sentencings. The video calendar will be limited to twenty (20) defendants. The Court sitting in C304 will hear no RALJ matters. Ex-parte agreed orders re-setting dates or requesting

assignment may be presented to the Criminal Hearings Judge scheduled to hear that calendar. The Court may hear in-custody criminal matters by audio-video means without the defendant transported to the courthouse.

6. Effective March 18, 2020, sentencings for out of custody defendants will be continued to a date after April 24, 2020, to be arranged with the Judge's law clerk assigned to that special set sentencing. All sentencings scheduled for out of custody defendants on the Criminal Hearings sentencing calendar shall be continued to a criminal hearings calendar after April 24, 2020. All in custody special set sentencings may be re-assigned to a specific judicial department throughout the day set for sentencing, rather than on the individual calendars for each judge at 1pm. The Presiding judge will attempt to determine which department(s) will be assigned the sentencings the day before the proceedings.
7. To the extent possible, the attorney representing a criminal defendant related to a hearing that might result in the defendant being released from the Snohomish County Jail should advise the Presiding Judge a minimum of one (1) day prior to the type of hearing so the Presiding Judge can attempt to assign the matter out to a particular department, if there is no availability to hear it in C304. If the matter cannot be heard in C304, the time of the hearing will be dependent on the schedules of the Judge, the attorneys, and transport.
8. With regard to continuances, the following rules shall apply until further order of the Court:
    a. Orders continuing cases need not be signed by the defendant to be approved.
    b. Defense counsel shall provide notice of new court dates to their clients.

c. The Prosecuting Attorney's Office shall summons all pro se defendants for new court dates.

d. Attorneys working remotely shall be permitted to sign any orders through digital signature, in accordance with SCLGR RULE 30.A - Digital Signatures.

Commissioner Matters

9. The following rules shall take effect on March 30, 2020:

a. Family Law Domestic Motions calendar

The family law domestic motions calendar will be limited to a maximum of 16 confirmed cases. Parties whose cases will not be heard due to exceeding the limit may agree to a new hearing date. Otherwise, their matters will need to be renoted. Parties should anticipate that contempt motions and motions related to primary care of children will have priority.

Hearings will be on submitted materials and without oral argument unless the judicial officer will have directed the parties to present telephonic oral argument. Parties may check the Odyssey portal after 5:00 p.m. two days before the hearing to learn whether they are expected to present telephonic oral argument. Any telephonic argument will be via CourtCall. Parties required to participate by CourtCall must call into CourtCall and be available just as if they were present in Court. To schedule an appearance with CourtCall, a party must follow the procedures set out in 10(a), below. Failure to do so may be grounds to strike the hearing or proceed without the participation of any missing party.

The moving party shall provide a signed proposed order to the court prior to the hearing. Failure to do so may result in the matter being stricken.

b. Guardianship

All matters other than petitions for new guardianships on the Guardianship/Probate calendars shall be done without oral argument absent request by the court. This calendar shall be limited to a total of fourteen (14) confirmed cases, subject to the rules set forth above. Failure to provide a signed proposed order may be grounds for the Court to strike the hearing

Motions on petitions for new guardianships will be heard telephonically on CourtCall. Parties shall call in to CourtCall and be available on CourtCall just as if they were present in court. To schedule an appearance with CourtCall, a party must follow the procedures set out in 10(a), below. Failure to do so may be grounds to strike the hearing or proceed without the participation of any missing party.

The moving party shall provide a signed proposed order to the court prior to the hearing. Failure to do so may result in the matter being stricken.

c. Ex Parte

Petitions for vulnerable adult protection orders, sexual assault protection orders, extreme risk protection orders, domestic violence protection orders, and anti-harassment protection orders may be electronically transmitted to the Court per instructions posted at https://snohomishcountywa.gov/PO. No other requests

for relief will be accepted electronically. Any approved agreed orders and any orders granting or denying petitions will be visible on Odyssey from which copies may also be obtained.

Persons seeking ex-parte emergency relief in essential matters who cannot do so electronically may present their pleadings to a facilitator in-person in the facilitator's office. Essential matters are petitions for vulnerable adult protection orders, domestic violence protection orders, sexual assault protection orders, extreme risk protection orders, and anti-harassment orders, and motions for emergency contempt and motions for immediate relief relating to children. The commissioner will consider the pleadings in chambers.

Having provided pleadings and any means of electronic contact, any in-person petitioners must then depart the courthouse. Petitioners without means to receive orders electronically may remain in the courthouse pending the judicial officer's decision. The reviewing judicial officer will either grant the petition for a temporary order and set a return date for hearing or deny the request for a temporary order. The signed order will be returned to the court facilitator's office for distribution to the petitioner. If the order is granted, the facilitator will also provide the temporary order to law enforcement for service.

Persons moving to set emergency show cause hearings may present their written motions in person at Court Administration on the fifth floor of the courthouse for presentation to a judicial officer. The person must provide Court Administration with contact information and then depart the courthouse. The judicial officer will review the motion and either grant the motion and schedule a

show cause hearing or deny the motion. The moving party may view the signed order in the Odyssey portal and obtain a copy of it from Odyssey. The moving party may also supply a self-addressed stamped envelope for return of the signed order for service on the non-moving party.

Persons moving for immediate relief relating to children may present their written motions at Court Administration on the fifth floor of the courthouse. The motion shall comply with CR 65 notice requirements. The court will review the motion and will grant or deny the motion. If the motion requests the immediate change of custody the moving party shall provide their phone number and the phone number of the opposing party if it is known. The court, in its discretion, may arrange a telephonic hearing via CourtCall to hear argument prior to ruling. The moving party may view the signed original order in the Odyssey portal and obtain a copy it from Odyssey. The moving party may also supply a self-addressed stamped envelope for return of the signed order for service on the non-moving party.

d. Civil Motions

The Commissioner Civil Motions Calendar shall resume per prior procedures except that:

i. The judicial officer will review matters on the written materials submitted. If the judicial officer requires telephonic oral argument, the parties may learn this by checking the portal after 5:00 p.m. on the last day of the confirmation period. Any telephonic oral argument will be via CourtCall. To participate via CourtCall, one must follow the

procedures set out in 10(a), below. Failure to do so may result in the matter being stricken or heard without a party's participation. Moving parties shall submit a proposed order. Failure to do so may be grounds to strike the matter.

ii. Pursuant to Governor's Proclamation 20-19, the Court will not hear unlawful detainer actions for default payment of rent for residential property, and nor shall it hear actions on writs of restitution involving a dwelling where the allegation is a failure to timely pay rent.

e. The pro se dissolution calendar

i. The pro se dissolution calendar will resume April 1, 2020. Parties shall present declarations or affidavits in lieu of testimony, in the form directed by the court and available on the court website. Litigants shall provide agreed or default orders to the court by noon at least one (1) day prior to the hearing. Failure to do so may result in the hearing being stricken.

ii. Attorney-involved default/agreed dissolutions, legal separations and invalidity actions shall be set by calendar note on Thursdays in Department A at 1:00 pm. Parties shall provide declarations or affidavits in lieu of testimony in the form directed by the court and available on the Court's website. Agreed orders must be provided to the court by noon at least one (1) day prior to the hearing. Failure to do so may result in the matter being stricken. Any matter on this calendar must be confirmed in accordance with existing local court rules.

f. Interpreter calendars.

Interpreter calendars shall be conducted telephonically via CourtCall. Parties participating by CourtCall shall follow the procedures in 10(a), below. Interpreter limited to a total of four hearings per calendar unless, in the discretion of the Court Commissioner, the number of hearings for a particular calendar can be expanded. Parties should anticipate that petitions for anti-harassment orders, domestic violence orders, contempt matters, and emergency parenting plan matters will have priority. Anti-harassment orders and domestic violence orders need not be confirmed and will have priority. All other matters must be confirmed.

If the total number of cases on a calendar exceeds four matters, then the judicial officer will continue contempt and emergency parenting plan matters to the next available date unless he or she decides to expand the number of cases on the calendar. If more than four anti-harassment and/or domestic violence matters are set, the Commissioner will set the additional matters to the next available date, not to exceed fourteen (14) days out, unless he or she decides to expand number of cases on the calendar. A copy of the ex-parte order continuing the hearing and extending the restraints will be mailed to the parties or their attorneys at the address provided to the court if all parties have been properly notified of the hearing dates set. If not, service may be made through law enforcement. Mailing of the order shall be deemed effective service. Parties for these matters may also pick up a copy of the order on the date originally set for hearings at the Courthouse Facilitator's Office.

g. Weapons surrender hearings shall proceed as usual.

h. All special set hearings and extended hearings shall be suspended pending further order of the court.

i. Matters on the State paternity calendar and State telephonic hearings calendar are suspended pending further order of the Court.

j. All Guardian Ad Litem compliance hearings will be heard on the written materials submitted, without oral argument.

k. Parties should refer to the Court's website for updates or modifications to court procedures.

Telephonic or Video Hearings (CourtCall)

10. Beginning March 30, 2020, the Court will conduct no hearings at the main courthouse in which lawyers, litigants, or witness shall be heard while attending in-person, except in essential cases. Essential cases shall be criminal or offender matters, petitions for domestic violence protection orders, anti-harassment orders, temporary immediate restraining orders, extreme risk protection orders, vulnerable adult protection orders, and sexual assault protections orders. For all other hearings for which persons would otherwise appear in person, persons will instead appear telephonically. Telephonic appearances for non-essential hearings before a judge shall be by CourtCall unless the judge specifies otherwise. No person participating by CourtCall will be required to pay for the service.

    a. To schedule an appearance via CourtCall, for oneself or anybody else, a person must call 1-888/882-6878 by 2:00 p.m. the day prior to the hearing and must provide the case name, the cause number, the date and time of the

hearing, and the location of the hearing if the person knows it. Any person who has not scheduled an appearance via CourtCall by 2:00 p.m. the day prior to a hearing taking place after March 31, 2020 shall be deemed to have failed to appear unless the judicial officer has granted leave to extend the deadline.

b. Anyone who has an appearance scheduled on CourtCall must call in on the date of the hearing by the time the court calls the case or else the person shall be deemed to have failed to appear. All hearings which would otherwise be conducted in an open court room shall be conducted in an open courtroom.

c. Persons appearing in-person on non-essential matters, in violation of the Governor's proclamation, will not be heard.

d. In adult criminal cases and petitions for domestic violence protection orders, anti-harassment orders, temporary immediate restraining orders, extreme risk protection orders, vulnerable adult protection orders, and sexual assault protection orders, the Court will hear from parties, lawyers, and witnesses who appear in person, but they are hereby encouraged to arrange for telephonic appearances instead. The Court may take such measures as it deems necessary to protect people in the courtroom from infection, including but not limited to enforcing social distancing and ordering the wearing of masks when available.

e. For adult criminal trial call, all out-of-custody defendants and the attorneys in the case may appear telephonically.

Interpreter Services

11. Persons having a right to be heard who need interpreter services for hearings in the main courthouse may request such services by calling 425/388-3421 or by e-mailing ssc-interpreter.support@snoco.org or de.brandstrom@snoco.org. Persons having a right to be heard who need interpreter services for hearings at the Denney Juvenile Justice Center may request such services by calling 425/388-7960 or by e-mailing toni.elmendorf@snoco.org. Interpreter services may be telephonic.

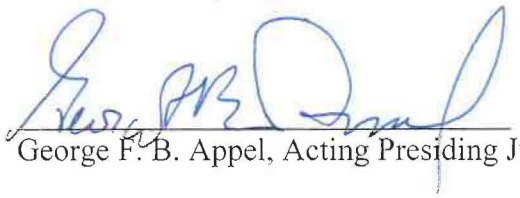
Other Matters

12. All civil motions on the Judges' Civil Motions Calendar, Tuesday through Friday, shall be considered on written materials submitted without oral argument, unless the Judge assigned to that civil motions calendar specifically requests telephonic argument.
13. All civil motions to continue trial shall be considered on the written materials submitted unless the presiding judge requests telephonic argument.
14. A supplemental emergency order may be filed to address matters at Denney Juvenile Justice Center not addressed in this order.
15. Any matters not addressed in this emergency order shall proceed in the manner consistent with all State and Local Court rules.
16. For all calendars, moving parties shall provide the judicial officer with a proposed order. The Court may strike any matter for which there is no proposed order.

This Order will take effect March 30th and will remain in effect until further order of the Court. This order shall supersede both Emergency Order #1 and Emergency Order #2 together with all amendments to each of them, to the extent those orders and amendments are inconsistent

with this order. This order shall further supersede Superior Court Administrative Order 11-12 and Washington State Supreme Court's Amended Order No. 25700-B-607, to the extent those orders are inconsistent with this order, and this order shall constitute a temporary modification of Snohomish County Local Court Rules to the extent those rules are inconsistent with this order.

DATED this 27th day of March, 2020



George F. B. Appel, Acting Presiding Judge

BISHOP LAW OFFICES, P.S.

March 28, 2020 - 11:39 AM

Transmittal Information

Filed with Court:	Supreme Court
Appellate Court Case Number:	98221-0
Appellate Court Case Title:	Maria Jesus Saralegui Blanco v. David Gonzalez Sandoval et al.
Superior Court Case Number:	18-2-08290-9

The following documents have been uploaded:

- 982210_Answer_Reply_20200328113641SC441941_2052.pdf
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- ofelia.granados.f9ko@statefarm.com
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