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No. 98319-4

SUPREME COURT
OF THE STATE OF WASHINGTON

DAVID LADENBURG, in his capacity as a
Tacoma Municipal Court Judge,

Petitioner,

v.

DREW HENKE, in her capacity as the
Presiding Judge of the Tacoma Municipal Court,

Respondent.

REPLY BRIEF OF
PETITIONER LADENBURG

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A. INTRODUCTION

The brief of the City of Tacoma (“City”) presented on behalf of Judge Drew Henke is an exercise in misdirection. Because the facts and law in this case disfavor its position, the City hopes to divert this Court’s attention from its own inattentiveness to addressing domestic violence (“DV”) cases like Mr. Nester’s, and the absence of any finding by Judge Henke or authority under GR 29(f) or statute justifying the transfer of *Nester* case #1 from Judge Ladenburg to another judge of the Tacoma Municipal Department of the Pierce County District Court (“Tacoma court”).¹ In its desperation, the City even resorts to an unwarranted, unsupported suggestion that Judge Ladenburg violated judicial ethical norms in insisting on performing his judicial duties.

Judge Henke’s unprecedented decision as Tacoma court presiding judge to remove Judge Ladenburg against his will from hearing the revocation of a disposition in a case he initially ordered implicates profound issues of judicial independence. Judge Henke’s interpretation of her authority under GR 29(f) affects the entire Washington judiciary and public confidence in it. This Court must exercise its original constitutional jurisdiction to issue an appropriate writ where this Court is the ultimate

¹ As will be noted *infra*, the City vainly attempts to obscure the fact that ultimately Judge Henke and Judge Ladenburg are district court judges, traditionally considered state officers.

authority on the power of the judiciary in this State with the plenary authority to supervise the lower courts and individual judges. No other court, except this Court, has similar power to control the actions of presiding judges.

B. REPLY ON STATEMENT OF THE CASE

The City's factual arguments, resp't br. at 2-5, are remarkable both for what they address and what they deliberately refuse to address.

The City does not dispute the interplay between Judge Henke and Judge Ladenburg over the *Nester* cases. That communication only confirms that Judge Henke arbitrarily decided to remove Judge Ladenburg from *Nester* case #1 without his involvement or consent. Judge Henke indicated that she intended to remove the case from him the day after *Nester* filed a motion to consolidate, without setting a hearing or otherwise calling for input from the affected parties. Agreed Facts at 3. In fact, she dared Judge Ladenburg to present legal authority that precluded her from interfering with the case which he had overseen as part of Tacoma's DV court for years. *Id.*

The City literally has *no answer* to Judge Ladenburg's discussion in his opening brief of the Tacoma court's treatment of DV cases and his role in the handling of its special DV court. Pet'r br. at 28-31. There is little question that the judge takes his role in the handling of DV cases

very seriously.² Defense counsel might not like his commitment to addressing DV cases, but that does not justify Judge Henke's consolidation decision. The filing of affidavits of prejudice against Judge Ladenburg, something he rarely experienced during his first 13 years on the bench, Ladenburg Decl. at 1 attached to Agreed Facts, were calculated to eliminate the DV court.

As one example, Mr. Nester was involved in *four* separate DV cases, cases that involved the same victim. Pet'r br. at 2-4. The City's lenient treatment of Mr. Nester has seemingly emboldened him to continue his pattern of DV. And, as will be noted *infra*, his *repeated* DV involvement constitutes legitimate grounds for revocation of his favorable, lenient disposition in *Nester* case #1.³ Thankfully, the Legislature enacted

² By contrast, the efforts of the City and its City Attorney's Office on DV cases reveals a lackadaisical attitude toward such cases. *See, e.g.*, News Tribune Editorial Board, *What took Tacoma so long to get rid of code that punished domestic violence victims?*, <https://www.thenewstribune.com/opinion/editorials/article240716271.html> (last accessed October 12, 2020).

³ The City repeatedly references the fact that Nester was exonerated in one of the four DV cases against him, resp't br. at 4, 11, but, of course, the criminal burden for *conviction* is stricter than the burden for *revocation* of a lenient disposition in *Nester* case #1. *State v. Kuhn*, 81 Wn.2d 648, 650, 503 P.2d 1061 (1972) (rejecting "beyond a reasonable doubt" standard). And courts possess the inherent authority to revoke a deferred sentence for domestic violence based on their own assessment of the case. RCW 9.95.210; Laws of 2019, ch. 263 § 302 (clarifying that courts have inherent power to revoke deferred sentences for domestic violence); *see also, Kuhn*, 81 Wn.2d at 650 ("The granting of a deferred sentence and probation, following a plea or verdict of guilty, is a rehabilitative measure, and as such is not a matter of right but is a matter of grace, privilege, or clemency granted to the deserving and withheld from the undeserving, within the sound discretion of the trial judge.") (quotation omitted). Judge Henke had no authority to remove this case from Judge Ladenburg because she disagreed with his

new legislation to curb such repeated lenient treatment in the future. Laws of 2019, ch. 263 § 701 (adding language to RCW 10.05.010(2) that “a person may not participate in a deferred prosecution program for a misdemeanor or gross misdemeanor domestic violence offense if he or she has participated in a deferred prosecution program for a prior domestic violence offense.”)

The City repeatedly references the fact that Nester was represented by private counsel in case #1 and by public defenders in later DV cases against him, who filed affidavits against Judge Ladenburg in those cases. Resp’t br. at 2, 10-11, 16. This point only underscores the fact that Nester’s public defenders’ motion to consolidate all the *Nester* cases was a tactic to obtain a *de facto* affidavit of prejudice against Judge Ladenburg in *Nester case #1*, an affidavit that was never filed, and a part of a larger effort to undercut the Tacoma court’s dedicated DV court. Judge Henke condoned such a tactic by granting the motion, with the City Attorney Office’s approval (the City Attorney moved jointly with Nester’s counsel for consolidation).

The City also decries the fact that the tactical affidavits of prejudice against Judge Ladenburg have resulted in a dislocation of judicial workloads in the Tacoma court. Resp’t br. at 9. And yet, the City

informed, *discretionary* decision.

wants to *further exacerbate* the alleged problem by transferring *Nester* case #1 from Judge Ladenburg's docket to Judge Christopher.

Ultimately, notwithstanding the foregoing background facts, the most critical point for this Court's analysis that is *nowhere* addressed by the City in its brief is the absence of any finding by Judge Henke justifying the transfer of *Nester* case #1 from Judge Ladenburg's docket after he initially heard that case, ordered the SOC, and conducted an extensive hearing with witnesses on its revocation. Judge Henke certainly made no finding on any alleged ethical violation by Judge Ladenburg in retaining authority over *Nester* case #1, as will be discussed *infra*. Nor did Mr. Nester himself or the City Attorney ever make such an unsupported argument to Judge Ladenburg or Judge Henke.

C. ARGUMENT

(1) District Court Judges Are State Officers Subject to This Court's Original Jurisdiction under Article IV, § 4 and RAP 16.2

In an effort to respond to Judge Ladenburg's argument that as a district court judge, albeit of a municipal department of such court, he is a state officer under article IV, § 4, pet'r br. at 12-19, the City hopes that by repeating throughout its brief that the Tacoma court is a municipal court, that will suffice for real analysis. It does not.

The undisputed facts evidencing Judge Ladenburg's and Judge

Henke's status as state officers are the following:

- The Tacoma court is a department of the Pierce County District Court;
- The judges are elected, not appointed or contracted by the City or any of its officials;
- The judges' salaries are not set by the City, but by the State Salary Commission;
- The judges' salaries are paid in part by the State;
- The judges' pensions are set by state law and administered by the State, not the City;
- The presiding judge's authority is set by GR 29(f), a state rule;
- The judges are subject to the CJC and discipline by this Court and a State Commission;
- The judges may be removed from office only by this Court for serious ethical misconduct, by a supermajority vote of the Legislature, or through impeachment.

As discussed in Judge Ladenburg's opening brief, it would be illogical to conclude that these judges are not state officers given these facts, especially the undisputed fact that they can only be removed by the state's Legislature or its highest court. And it would be contrary to the plethora of legal authority Judge Ladenburg provided from across the country showing that district and municipal court judges who are part of a unified court system are state, not local, officers. Pet'r br. at 15-16 (citing,

e.g., Hamilton v. City of Hayti, Mo., 948 F.3d 921, 929 (8th Cir. 2020) (in a state where municipal courts are “divisions of circuit courts” municipal judges are “judicial officers of the State judicial system.”); *Peterson v. Bense*, 259 N.W. 389, 390 (Minn. 1935) (“The judges of...municipal courts are state officers and not officers of the municipality electing them.”)). The City makes *no attempt* to distinguish these authorities because it cannot. It fails to even cite them in its brief.

Judge Henke and Ladenburg are state officers, and original jurisdiction in this Court is proper.

(2) This Court Should Issue an Appropriate Writ in This Case Because Judge Henke’s Consolidation Order Depriving Judge Ladenburg of His Judicial Case Responsibilities Was in Excess of Her Authority as a Presiding Judge

Judge Ladenburg articulated in his opening brief at 19-28 why this Court should issue a writ to prevent Judge Henke from depriving him of his responsibilities in *Nester* case #1. The City argues that Judge Ladenburg had no protected interest in his case responsibilities, Judge Henke had plenary authority as the Tacoma court’s presiding judge to deprive Judge Ladenburg of his case responsibilities in *any* case at *any* stage of the case, and that Judge Ladenburg failed to meet the test for the issuance of a writ. Resp’t br. at 9-18. The City is wrong on each point.

(a) Acting for the Public, Judge Ladenburg Has a Protected Interest in His Case Responsibilities that Cannot Be Taken Away, Absent Compliance with Statutory Mandates Concerning the Transfer of a Case

The City contends that Judge Ladenburg lacks any “rights, interest, or stake in cases coming before him,” resp’t br. at 9, and therefore has no basis to seek any relief from Judge Henke’s illicit order. The City is wrong in arguing that elected judges are fungible, pieces to be used by a presiding judge as she/he arbitrarily chooses. The City plainly minimizes the fact that the people of Tacoma *elected* Judge Ladenburg to be their judicial officer. Through her administrative efforts, Judge Henke cannot deprive Tacoma’s citizens of their selection.

Initially, the City argues that multiple judges routinely address aspects of a case. Resp’t br. at 9-10. It cites the fact that multiple judicial officers heard *procedural* matters in this case. *Id.* at 10 n.5. But the involvement of such officers was with Judge Ladenburg’s consent in most instances. Cooperation among judicial officers in addressing cases is certainly to be encouraged to better serve the public and make the justice system efficient. CJC 2.5(b). It is, however, a big leap from such cooperation to the notion that a presiding judge may deprive a judge’s

ability to hear a case, against that judge's wishes.⁴

Washington law in a variety of places is directly to the contrary. With regard to affidavits of prejudice, RCW 4.12.050, a party may not secure a change of judge once that judge has made a discretionary decision. *Godfrey v. Ste. Michelle Wine Estates Ltd.*, 194 Wn.2d 957, 961-62, 453 P.3d 992 (2019). Implicit in that policy is the fact for prudential and legal reasons once a judge is assigned to a case, he/she must be the one to handle the case thereafter.

Moreover, if judges are fungible pieces in the justice system, as the City contends in its brief at 10 ("The process works because the judicial officers are neutral adjudicators that do not have vested interests in the cases to which they are assigned."), it certainly cannot explain this Court's decisions in which new trials were awarded when a judge dies or becomes incapacitated before he/she enters findings of fact and conclusions of law. *E.g., DGHI Enterprises v. Pacific Cities, Inc.*, 137 Wn.2d 933, 977 P.2d 1231 (1999) (new trial ordered upon death of a judge after trial but before entry of findings/conclusions).⁵ Simply put, judges are not fungible

⁴ The City offers no limiting principle on this presiding judge authority. Pet'r br. at 14. ("Nothing in CR 29 or in statute limits the presiding judge's authority when assigning cases among the judicial officers within the Court."). Under its analysis, the presiding judge could take a case away from a judge mid-trial, after trial, and during sentencing. It cannot cite a statute or a case supporting such an extreme position.

⁵ Several rules, civil and criminal, address the disability of a judge. *See* CR 63; CRLJ 63; CrR 8.9; CrRLJ 8.9.

pieces, but independently elected judicial officers.

RCW 2.28.030 defines a judicial officer and provides that such an officer “shall not act as such in a court of which he or she is a member ... (2) When he or she was not present and sitting as a member of the court at the hearing of a matter submitted for its decision.” This statute has been construed to limit the authority of successor judges. *See, e.g., Johnston v. Johnston*, 116 Wash. 322, 199 Pac. 737 (1921) (judge who did not hear evidence in dissolution action lacked authority to enter order modifying a decree). In the criminal setting, a judge who did not hear the actual evidence may not enter findings of fact on a matter but may sign findings of fact of a fellow judge, a ministerial act. *See, e.g., State v. Ward*, 182 Wn. App. 574, 330 P.3d 203, *review denied*, 181 Wn.2d 1027 (2014).⁶

Moreover, as Judge Ladenburg argued, CJC Rule 2.7 commands that a judge handle matters properly assigned to her/him. CJC 2.7 establishes a duty on Judge Ladenburg’s part to decide. The Comment [1] to that rule is telling, stating:

⁶ There are pre-*DGHI Enterprises* cases holding that a judge who did not hear the evidence may sentence an offender if the original judge died, retired, or her/his term of office expired. *State v. Lindsey*, 194 Wash. 129, 77 P.2d 596, *cert. denied*, 305 U.S. 637 (1938); *Jaime v. Rhay*, 59 Wn.2d 58, 61-62, 365 P.2d 772 (1961); *State v. Bowen*, 12 Wn. App. 604, 531 P.2d 837 (1975); *State v. Soto*, 45 Wn. App. 839, 727 P.2d 999 (1986); *State v. Bryant*, 65 Wn. App. 547, 829 P.2d 209 (1992). Of course, none of these factors is present in this case. *But see, State v. Sims*, 67 Wn. App. 50, 834 P.2d 78 (1992), *review denied*, 120 Wn.2d 1028 (1993) (no requirement that prior judge be unavailable by disability or otherwise for successor to sentence).

Judges must be available to decide the matters that come before the court. Although there are times when disqualification is necessary to protect the rights of litigants and preserve public confidence in the independence, integrity, and impartiality of the judiciary, judges must be available to decide matters that come before the courts. Unwarranted disqualification may bring public disfavor to the court and to the judge personally. The dignity of the court, the judge's respect for fulfillment of judicial duties, and a proper concern for the burdens that may be imposed upon the judge's colleagues require that a judge not use disqualification or recusal to avoid cases that present difficult, controversial, or unpopular issues.

The comment establishes that not only did Judge Ladenburg have a duty to decide, he had a duty to avoid recusal lest recusal adversely impact the Tacoma court's administration of justice.

The City's effort to imply that Judge Ladenburg violated ethical norms in deciding on the revocation in *Nester* case #1, resp't br. at 11, is a tawdry tactic that is unsupported by *any* finding by Judge Henke and is belied by the fact that *the City Attorney moved for the revocation of Nester's SOC in that case.*

In fact, under the heading of "those in glass houses . . .," it was *Judge Henke* who had an ethical obligation to cooperate with Judge Ladenburg that she overlooked. As presiding judge, *Judge Henke* had a duty to cooperate with Judge Ladenburg. CJC 2.5(b) ("A judge shall cooperate with other judges and court officials in the administration of court business."). Consolidating cases in a preemptory fashion without

consulting Judge Ladenburg, facilitating the tactics of certain defense counsel to remove him from any of Mr. Nester's cases constituted an improper *de facto* RCW 4.12.050 affidavit in *Nester* case #1 and does not comport with the clear purpose of the rule.

In sum, Judge Ladenburg had an interest in the proper disposition of *Nester* case #1 that he can seek to protect. He acted to vindicate the larger public right to proper disposition of cases in the judicial system.

(b) Judge Henke Lacked Authority to Transfer *Nester* Case #1

The City concedes that RCW 3.66.090 applies here, pet'r br. at 15-16,⁷ but it cannot establish that either RCW 3.66.090 or GR 29(f) authorized Judge Henke's actions here. Critically, notwithstanding its argument on what Judge Henke *might* have thought about RCW 3.66.090 in Judge Ladenburg's case, pet'r br. at 15-17, the City cannot point to *anything* in this record documenting *a finding* by Judge Henke that the transfer of *Nester* case #1 was justified under RCW 3.66.090. *Id.* at 16 ("...nothing in RCW 3.66.090 requires specific findings to be entered regarding the basis for the consolidation/transfer of a case."). The City's fanciful re-creation of the record does not suffice for an actual finding or order, particularly when such a consequential decision is made.

⁷ By its use of emphasis, the City concedes that RCW 3.66.090(1) relating to a party's inability to receive a fair trial does not apply. Pet'r br. at 15.

Even if a *post-hoc* analysis under RCW 3.66.090 is justified here, the City's allegations supporting the *de facto* affidavit of Judge Ladenburg fail. The City implies that Judge Ladenburg conducted an "unfair" hearing because he denied Mr. Nester's *fourth* request for a continuance. Resp't br. at 4. That is false. A more cynical observer might suggest that the continuances were designed to facilitate the motion to consolidate the *Nester* cases.

The City notes repeatedly that Mr. Nester was exonerated in one criminal DV case, implying that it was "unfair" for Judge Ladenburg to act on similar evidence to revoke his SOC in *Nester* case #1. Again, the City moved to terminate the SOC in *Nester* case #1. Moreover, it is well understood that the burden of proof in criminal cases is heavier than in the revocation of a lenient disposition like the SOC. The burden to revoke a deferred sentence or probation is less than proof beyond a reasonable doubt. *Kuhn*, 81 Wn.2d at 650. *See also, City of Aberdeen v. Regan*, 170 Wn.2d 103, 239 P.3d 1102 (2010) (offender violated "no criminal violations of the law" probation term; no requirement of proof beyond a reasonable doubt). It is no different for an SOC.

Finally, the City repeatedly notes that Judge Ladenburg's initial revocation decision was reversed in a RALJ appeal because the City Attorney did not move to revoke the SOC. Pet'r br. at 3, 11, 19. But,

even assuming the decision on the RALJ was correct, that is a moot issue here when it is undisputed that *the City itself* moved to revoke the SOC in *Nester* case #1. Moreover, that fact alone does not justify Judge Ladenburg's removal. A direct analogy is an appellate court's reversal of a trial court's decision does not require remand to a different judge, without *much* more. *See, e.g., GMAC v. Everett Chevrolet, Inc.*, 179 Wn. App. 126, 154, 317 P.3d 1074, *review denied*, 181 Wn.2d 1008 (2014) (parties must offer proof of bias to justify remand to a different judge); *In re Davis*, 152 Wn.2d 647, 692, 101 P.3d 1 (2004) ("Judicial rulings alone almost never constitute a valid showing of bias.").

(c) A Writ Should Issue in This Case

As discussed in Judge Ladenburg's opening brief, a constitutional writ of mandamus is appropriate in this case to correct Judge Henke's "clear and manifest abuse of discretion" that exceeded her official authority. Pet'r br. at 20-22 (citing, *e.g., Brown v. Owen*, 165 Wn.2d 706, 726-27, 206 P.3d 310 (2009); *Walker v. Munro*, 124 Wn.2d 402, 411, 879 P.2d 920 (1994)). A presiding judge does not have appellate review power over a co-equal judge of the same court. Likewise, a statutory writ is appropriate to "arrest[] the proceedings" that are "without or in excess of the jurisdiction of such tribunal, corporation, board or person." RCW 7.16.290.

The City wrongfully argues that a writ is not necessary to correct Judge Henke's abuse of power because "this case does not involve the Respondent reconsidering a ruling of the Petitioner." Resp't br. at 14. Not true. Judge Henke clearly exceeded her authority by acting as a pseudo-appellate court, reconsidering Judge Ladenburg's decision to revoke Nester's SOC by transferring that case from him before he could impose appropriate sanctions. A writ should issue to prevent her from intruding on Judge Ladenburg's mandatory case responsibilities as a co-equal elected judge.

Try as it might to mischaracterize the proceedings below, the City cannot escape the undisputed facts of this case – Judge Henke transferred the case to another judge because she disagreed with Judge Ladenburg's discretionary ruling. In effect, Judge Henke gave Nester a *de facto* affidavit of prejudice in case #1.

Judge Ladenburg's efforts on the revocation of the SOC in case #1 were wasted. He conducted a revocation hearing after denying a continuance, where the parties and victim attended. Agreed Facts at 4-5. He heard live testimony and evidence. *Id.* He entered findings of fact, revoking Nester's SOC in *Nester* case #1. Several days later, Judge Henke decided she would grant the motion to consolidate and, acting as a pseudo-appellate court, she wrote to Judge Ladenburg telling him he would need

to “vacate” his findings. Agreed Facts at 5. She exposed her pseudo-appellate function in a subsequent email, explaining the basis for her ruling that Judge Ladenburg’s decision was erroneous and the case should be transferred from him because she felt that Judge Ladenburg should have granted Nestor a yet another continuance to prepare for the hearing:

I heard the defense motion to vacate findings from the case in your department and to consolidate all three cases into Department 3. I had the opportunity to review portions of the transcript of the hearing you held regarding the motion to revoke the SOC in the case assigned to your caseload...You[r statement] that [the parties] were ready to proceed...was not the case...I [] have the authority as presiding judge to transfer all three cases to Department 3 in order to resolve the disputes in these cases fairly and expeditiously.

Agreed Facts at 6-7.

But Judge Henke lacked authority to review Judge Ladenburg’s discretionary decision.⁸ While Judge Henke may have some limited administrative authority to assign cases under GR 29, she does not have the power to transfer cases after a decision has been made but before a penalty is imposed, merely because she disagrees with the outcome. That is a manifest abuse of discretion and exceeds a presiding judge’s authority. A writ is a proper avenue to correct this clear abuse of authority.

⁸ “[T]he decision to grant or deny a continuance rests within the sound discretion of the trial court.” *State v. Castillo-Lopez*, 192 Wn. App. 741, 746, 370 P.3d 589, review denied, 185 Wn.2d 1038 (2016).

A constitutional or statutory writ is also the only remedy available to Judge Ladenburg, who is not a party to the *Nester* cases and therefore has no standing to intervene and oppose consolidation or otherwise correct Judge Henke's manifest abuse of her power. Such an effort might have overstepped ethical constraints in that litigation. A writ is appropriate because he lacks "a plain, speedy and adequate remedy in the ordinary course of law." See RCW 7.16.170, .300; *Judges of Benton-Franklin Counties v. Killian*, 195 Wn.2d 350, 459 P.3d 1082 (2020).

The City argues that Judge Ladenburg has an alternative remedy, claiming he could have requested a change or comment to GR 29 clarifying that a presiding judge may not exercise appellate powers like Judge Henke did. Resp't br. at 18. This argument fails for several reasons. First, for all the reasons stated above and in Judge Ladenburg's opening brief, GR 29 needs no clarification – Judge Henke had no authority to transfer the case because she disagreed with Judge Ladenburg's decision. A presiding judge must respect another co-equal judge's authority and autonomy over assigned cases. This is especially true when it comes to specialty and therapeutic courts like the DV court at issue here. Second, seeking a rule change, even if successful, would provide no remedy *in the current situation*. But for this petition and the stay granted along with it, the case would already have been transferred

and Judge Ladenburg's findings vacated due to Judge Henke's actions.

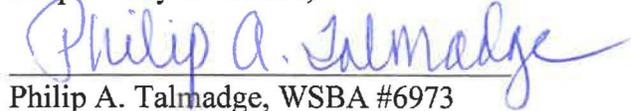
This is a unique case with important consequences, not only for this case, but for courts across the state. This Court has jurisdiction and authority to grant a writ to prevent future abuses of power from presiding judges who exceed the limited administrative authority granted by GR 29.

D. CONCLUSION

Judge Henke lacked authority to deprive Judge Ladenburg of his case responsibility in *Nester*. This Court should issue a writ of mandamus or writ of prohibition directing Judge Henke to withdraw any order purporting to override the authority of Judge Ladenburg in the *Nester* matter. Costs, including reasonable attorney fees,⁹ should be awarded to Judge Ladenburg.

DATED this 13th day of October, 2020.

Respectfully submitted,



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⁹ The City is paying for Judge Henke's representation, but has declined to pay for Judge Ladenburg's representation. This is grossly inequitable where Judge Ladenburg is forced to pay out of pocket to defend the independence and integrity of his office from the wrongful intrusions on his independence by a fellow judge.

DECLARATION OF SERVICE

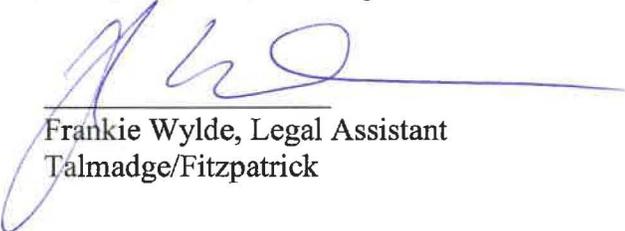
On said day below I electronically served a true and accurate copy of the *Reply Brief of Petitioner Ladenburg* in Supreme Court Cause No. 98319-4 to the following:

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Original E-filed via appellate portal with:
Supreme Court Clerk's Office

I declare under penalty of perjury under the laws of the State of Washington and the United States that the foregoing is true and correct.

DATED: October 13, 2020, at Seattle, Washington.


Frankie Wylde, Legal Assistant
Talmadge/Fitzpatrick

TALMADGE/FITZPATRICK

October 13, 2020 - 11:49 AM

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Appellate Court Case Number: 98319-4
Appellate Court Case Title: David Ladenburg v. Drew Henke

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Comments:

Reply Brief of Petitioner Ladenburg

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