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COURT OF APPEALS
2011 APR -1 11:10:11

No. 66140-0-I

COURT OF APPEALS DIVISION ONE
OF THE STATE OF WASHINGTON

SCOTT E. STAFNE
Advocate, Officer of the Court, Appellant

vs.

SEATTLE SCHOOL DISTRICT NO. 1

Respondent/Appellee

APPEAL FROM SUPERIOR COURT
FOR KING COUNTY

APPELLANT'S REPLY BRIEF

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 ORIGINAL

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I. Introduction

The District's Answering Brief (District's Brief) does not dispute that the Transcript of Evidence filed with the Superior Court did not meet the timeliness or certification requirements set forth by the legislature in RCW 28A.645.020. Therefore, Stafne has nothing to reply to with regard to these issues.¹

The District's Brief offers no authority or argument that Stafne abandoned his clients by refusing to participate in an appeal that did not

¹ Because the District does not dispute in its answering brief Stafne's contention that the appeal proceedings based on a record which did not comply with RCW 28A.645.020 would have been illegal and in violation of the Separation of Powers, this Court could determine the District has conceded this issue. Stafne believes the failure to consider this important issue would be unfair to the District and the people of Seattle who continue to be subjected to the District's refusal to comply with RCW 28A.645.020. Therefore, Stafne does not oppose this Court providing the District with an opportunity to supplement its brief to explain how the Transcript of Evidence it filed complied with the timeliness and content requirement of RCW 28A.645.020. Alternatively, in order that the Court might decide the important constitutional issues which underlie the issue of whether Stafne abandoned his clients when he refused to participate in arguing the substantive merits of the appeal based on a record the School Board refused to "certify to be correct" this case should be consolidated with *Briggs v. Seattle School Board*, No. 66312-7-I. *Briggs* is currently before this Court and involves the same issue as to whether a Superior Court has judicial authority to hear and decide an appeal pursuant to RCW Chapter 28A.645 based on a record which does not comply with RCW 28A.645.020. Both Stafne and the appellants in *Briggs* intend to move for consolidation of these cases in the near future, but it should also be noted that pursuant to RAP 3.3 this Court can consolidate these cases through its own initiative.

comply with RCW Chapter 28A.645. However, Stafne will offer a "strict reply" to the Court's sua sponte conclusion that Stafne "abandoned" his clients as that issue relates directly to the District's argument that Stafne has no standing to bring this appeal.

Finally, with regard to the District's second argument, *i.e.* that Stafne was required to assign errors with regard to the District's standing and mootness arguments, Stafne's reply will be premised on authority cited by the District which holds an attorney has no personal standing to appeal issues which relate only to his clients. *See* District's Brief, p. 8.

II. Reply To District's "Statement Of Issues", pp. 1 - 2.

Stafne accepts issue 1 as framed by the District, regarding his standing pursuant to RAP 3.1 to challenge the Superior Court's final judgment that "his clients' appeals should be dismissed because Stafne abandoned their appeal" as being properly raised and ready for adjudication by this Court.

While Stafne accepts the District has framed issues that ask whether Stafne must have assigned errors to its contentions that the Superior Court found and/or should have found appellants had no standing and their case was moot, Stafne does not agree that he has standing in this personal appeal to assign error regarding issues that are peculiar to his

clients. *See Johnson v. Mermis*, 91 Wn. App. 127, 132, 955 P.2d 826 (1998).

III. Reply to District's "Statement of the Case"

Stafne's appeal only challenges the Superior Court's judgment dismissing his clients' appeal to the extent it is based on the conclusion that he abandoned their appeal. The final order states:

The first reason that this motion is granted is because the Appellant's attorney stated on the record at the hearing that he did not file his [substantive appellate] brief because he did not intend to pursue the claim because he felt he was precluded doing so by prior court orders of this and appellate Courts. This Court considers appellants to have, thus abandoned their case.

CP 586.

No other reasons were set forth in the Superior Court's final order for dismissing appellants' case. CP 585 - 586. Stafne claims the issue on appeal is whether Stafne abandoned his clients' case by refusing to participate in the substance of the appeal process pursuant to RCW Chapter 28A.645.020 where the District refused to certify the administrative record to be used in these proceedings "to be correct." Stafne contends that the facts do not support, and the District never argued in this appeal, that Stafne abandoned his clients where he made clear to the Court his intentions to challenge the Court's stated intention to decide the substantive merits of the appeal notwithstanding that the administrative

record produced was not timely under the statute and was not certified to be correct.

Stafne maintains that the record before this Court indicates he has taken extraordinary efforts on behalf of his clients. These efforts are not consistent with the Court's sua sponte conclusion that Stafne abandoned his clients. Stafne brought four separate appeals in Superior Court where he challenged the District's compliance with RCW 28A.645.020. CP 48, ¶ 2. When his arguments in these cases were rebuffed by the King County Superior Court, Stafne filed three motions for discretionary review and an original action against the Seattle School Board and three King County Superior Court judges in the Supreme Court with regard to this issue. CP 165 - 169, 250 - 354, 255 - 258, 269 - 264. Although the Supreme Court Commissioner, and ultimately the Supreme Court, denied discretionary review and to hear an original action, the Commissioner made clear that the school board must certify the Transcript of Evidence under RCW 28A.645.020 as part of any appeal proceeding pursuant to RCW Chapter 28A.645. CP 168, 243, 263. When the cases, including this one, were returned to Superior Court Stafne made clear that he would not participate in the merits of any appeal which was based on a record the school board refused to certify to be correct. CP 359:12 - 22. Stafne urged the Court in each case to allow parents to participate in substantive appeal hearings pro

se because as laymen they were not bound by Rule of Professional Conduct 3.3 regarding the utilization of false evidence. Stafne made clear that he believed RPC 3.3 precluded him and other attorneys from utilizing a record which had not been certified to be correct as the basis for arguing any appeal brought pursuant to RCW Chapter 28A.645. *See, e.g.*, CP 315 – 316, 317 – 320, 357:2 - 359:21.

Stafne would ask the Court to take judicial notice that in three of the King County Superior Court appeals involving this issue, Judge Inveen ruled that Stafne's refusal to participate in the briefing and presentation of evidence from a record that was not certified to be correct was appropriate pursuant to RPC 3.3. A copy of Judge Inveen's order in the Brigg's case is attached hereto as part of Appendix 1. In this appeal, Judge Middaugh held Stafne's failure to participate in a substantive appeal process he believed was illegal constituted an "abandonment" of his clients sufficient to dismiss their appeal even though Stafne intended to pursue an appeal of the Superior Court's interpretation of RCW 28A.645.020.

IV. Reply to Argument

A. Reply to "Scott E. Stafne is not an aggrieved person under RAP 3.1 and he does not have standing to pursue this appeal." District's brief, pp. 6 - 9.

The District has not argued that Stafne's refusal to participate in the substantive merits of the appeal based on his belief that the appeal

proceeding would be contrary to law because the school board refused to certify the administrative record to be correct constituted abandonment of his clients' appeal. Indeed, it would have been difficult for the District to make such an argument; Stafne's conduct up to the point of the substantive appeal and stated intentions to follow through on an appeal based on the illegality of the Superior Court's appeal proceedings is not consonant with the definition of the verb "abandon."

The Merriam-Webster online dictionary defines the verb "abandon" to mean:

transitive verb

- 1 *a*: to give up to the control or influence of another person or agent *b*: to give up with the intent of never again claiming a right or interest in <*abandon* property>
- 2: to withdraw from often in the face of danger or encroachment <*abandon* ship>
- 3: to withdraw protection, support, or help from <he *abandoned* his family>
- 4: to give (oneself) over unrestrainedly
- 5*a*: to cease from maintaining, practicing, or using <*abandoned* their native language> *b*: to cease intending or attempting to perform <*abandoned* the escape>

Merriam-Webster, "abandon," <http://www.merriam-webster.com/dictionary/abandon>.

There was no evidence before the Court that Stafne intended to abandon his clients or his claim that King County Superior Court was sanctioning illegal appeal proceedings. Rather, Stafne simply refused to

participate in proceedings he believed were illegal and with the intent to appeal the illegality of these proceedings to the appellate court. As is explained in Stafne's opening brief at pages 37 - 41, RPC 3.3 gave Stafne both the right, and likely the obligation, as an attorney and officer of the court to refuse to participate in any proceedings before a tribunal where false evidence will be submitted. Opening Brief, pp. 37 - 41. *See also* RPC 3.3(e) ("A lawyer may refuse to offer evidence the lawyer reasonably believes is false."); RPC 3.3, comment 6 ("If a lawyer knows that the client intends to testify or wants the lawyer to introduce false evidence, the lawyer should seek to persuade the client that the evidence should not be offered. If the persuasion is ineffective and the lawyer continues to represent the client, the lawyer must refuse to offer false evidence. . . .").

The District's Brief suggests the District has little, if any, knowledge about third party standing pursuant to RAP 3.1. The District actually contends a "party is only an aggrieved person when they have been named as a party to the action below, actively participated in that action below, and is adversely affected by the lower court judgment." Response Brief, p.7. This is not a correct statement of the law. Non-parties, including attorneys, have been frequently found to be aggrieved parties for purposes of RAP 3.1 where they have not been parties to the action below. *See, e.g., Mestrovac v. Dep't of Labor & Indus.*, 142 Wn.

App. 693, 704, 176 P.3d 536 (2008); *State v. A.M.R.*, 147 Wn.2d 91, 94 - 96, 51 P.2.3d 790 (2002); *State v. G.A.H.*, 133 Wn. App. 567, 574 - 576, 137 P.3d 66 (2006); *Butco v. Stewart Title Co. of Washington, Inc.*, 99 Wn. App. 533, 543 - 544, 991 P.2d 697 (2000).

Washington courts have specifically allowed attorneys to file appeals in cases to which they were not parties. *See, e.g., Loc Thien Truong v. Allstate Property and Cas. Ins. Co.*, 151 Wn. App. 195, 211 P.3d 430, 436 (2009); *Splash Design, Inc. v. Lee*, 104 Wn. App. 38, 44, 14 P.3d 879 (2000); *Breda v. B.P.O. Elks Lake City*, 120 Wn. App. 351, 353, 90 P.3d 1079 (2004); *Johnson*, 91 Wn. App. 127.

In all of the above cited cases, the general rule of third party standing for purposes of bringing an appeal is based on the proposition that: "[a]n 'aggrieved party' is one whose proprietary, pecuniary, or personal rights are substantially affected." Stafne's first claim for standing concerns those rights given to and duties imposed upon him as a result of his role as an Officer of the Court and as an attorney. In *Mestrovac*, 142 Wn. App. at 704, the Court of Appeals held that "a denial of some personal or property right, legal or equitable, or the imposition upon a party of a burden or obligation" was sufficient for purposes of establishing whether the board was "aggrieved" for purposes of filing an appeal. In *Mestrovac*, the Court of Appeals held a decision impacting the integrity of the board's decision-

making process was sufficient to make the board "aggrieved" under RAP 3.1. Stafne argues that the rights and duties imposed upon him with regard to participating in an appeal based on an illegal record impact the same type of integrity considerations as those involved in *Mestrovac*. If attorneys, as Officers of the Court, do not have standing to appeal the legality of proceedings such as those which occurred here, then their duty lies only to the judges of the court and not to the Court as an institution.

Where an attorney and officer of the Court, like Stafne, refuses to participate in a proceeding because he has reasonable grounds to believe it is illegal,² judicial prudence should require that such Advocates/Officers of the Court be given standing to prove their claims. Our world has witnessed the emasculation of other judicial systems as court personnel simply adjusted to new norms. Such memories should counsel in favor of appellate courts hearing claims that appeal processes which violate the law are being employed.³

² Stafne had obtained three rulings from the Supreme Court Commissioner, who observed that a certified record was required in an appeal brought pursuant the RCW 28A.645.020. Additionally Stafne had obtained a State Auditor's report in which the District admitted that the school board had not complied with the Open Public Meetings Act with regard to its school closure and student assignment decisions. CP 178, ¶ 2; 180-228.

³ Sometimes societies lose their way not because the language of the laws changes, but because the Courts and the Officers of the Court refuse to follow them:

Stafne's second argument in response to standing is less related to his position as an officer of the Court, but deals more with the Superior Court's denial of his clients' appeal because the judge misconstrued Stafne's refusal to file a brief based on false evidence as an abandonment of his clients' appeal.

When a court determines to dismiss an appeal because an attorney has abandoned his clients, there can be little doubt that the attorney has been accused of unethical conduct. In *Holland v. Florida*, 130 S.Ct. 2548 (2010), the Supreme Court concluded that an attorney who abandons

Appellant lays great value on the judgment in case No. 3, Tribunal III, entitled *United States v Joseph Altslotter et. al.* This was one of the Nuremberg trials held in 1947, in which 16 defendants who were former German judges, prosecutors or officials in the Reich Ministry of Justice, were found guilty of committing war crimes and crimes against humanity. The tribunal found, in effect, that while on paper the rights established by the Weimar Constitution were retained by the Nazis, there was a progressive degeneration of the judicial system under Nazi rule and that substantially every principle of justice enumerated by prior German law was violated by the Hitler regime. . . .

Estate of Alice A. Miller v. McGrath, 104 Cal. App. 2d 1, 11, 230 P.2d 667 (1951) (Finding that probate law applied equally to Americans); *but see Estate of Leefers*, 127 Cal. App. 2d 550 (1954) (finding otherwise).

Of course one can argue that the comparison between twenty-first century America and the Nazis is not appropriate, but in doing so, one should be cognizant that our forefathers declared "It is the paramount duty of the state to make ample provision for the education of all children residing within its borders, without distinction or preference on account of race, color, caste, or sex." Wash. Const. art. IX, § 1.

his client commits ethical misconduct. In *Holland*, the Supreme Court observed:

A group of teachers of legal ethics tells us that these various failures violated fundamental canons of professional responsibility, which require attorneys to perform reasonably competent legal work, to communicate with their clients, to implement clients' reasonable requests, to keep their clients informed of key developments in their cases, **and never to abandon a client**. See Brief for Legal Ethics Professors et al. as Amici Curiae (describing ethical rules set forth in case law, the Restatements of Agency, the Restatement (Third) of the Law Governing Lawyers (1998), and in the ABA Model Rules of Professional Conduct (2009)).

Id. at 2564-65 [Emphasis Supplied].

Other courts agree abandonment of a client constitutes misconduct and an ethical lapse. For example, the Supreme Court of California held, "A lawyer violates his or her ethical mandate by abandoning a client." *Pineda v. State Bar*, 49 Cal.3d 753, 758-759, 263 Cal. Rptr. 377, 781 P.2d 1 (1989). Indeed, client abandonment can be grounds for disbaring or suspending an attorney from the practice of law. *People v. Holmes*, 951 P.2d 477 (Colo. 1998) (attorney was disbarred for accepting fees from his clients and then abandoning them).

In this appeal there was no reasonable basis for the Superior Court to have concluded that Stafne's refusal to involve himself in the presentation of evidence that did not comply with RCW 28A.645.020

constituted an abandonment of his clients. Stafne made clear he intended to file an appeal to determine whether the appeal proceedings were illegal.

Attorney appeals, such as Stafne's appeal in this case, have been the subject of significant legal commentary. *See, e.g.,* Douglas R. Richmond, *Appealing from Judicial Scoldings*, 62 *Baylor L. Rev.* 741 (2010); Matthew Funk, Comment, *Sticks and Stones: The Ability of Attorneys to Appeal from Judicial Criticism*, 157 *U. Pa. L. Rev.* 1485 (2009); Carla Pasquale, Note, *Scolded: Can an Attorney Appeal a District Court's Order Finding Professional Misconduct?*, 77 *Fordham L. Rev.* 219 (2008); Robert B. Tannenbaum, Comment, *Misbehaving Attorneys, Angry Judges, and the Need for a Balanced Approach to the Reviewability of Findings of Misconduct*, 75 *U. Chi. L. Rev.* 1857 (2008). Each of these scholarly articles observes that there is considerable dissension between courts as to what should be the standard of review for "attorney appeals" of misconduct findings.

The Fifth, Tenth, and D.C. Circuits allow attorneys to appeal orders containing findings of misconduct even if those findings are not labeled as formal sanctions or associated with monetary sanctions. *See, e.g., Walker v. City of Mesquite*, 129 F.3d 831, 832 - 33 (5th Cir. 1967) (a nonparty attorney may appeal a finding of misconduct because of the potential reputational effects this might have on the attorney); *Butler v.*

Biocore Medical Technologies, Inc., 348 F.3d 1163, 1168 - 69 (10th Cir. 2003) (“an order finding attorney misconduct but not imposing other sanctions is appealable under § 1291 even if not labeled as a reprimand”); *Sullivan v. Committee on Admissions and Grievances*, 395 F.2d 1956 (D.C. Cir. 1967) (an attorney could appeal the district court’s finding that he had violated various ethics rules even though the district court dismissed the charges and did not impose monetary sanctions). All three of these circuits focus on assessing the attorney's standing under Article III with each circuit analyzing whether the injury requirement of Article III is satisfied by the damage that findings of misconduct may inflict on an attorney's reputation.

The Federal⁴ and First⁵ Circuits have adopted an approach that allows attorneys to appeal all orders in which the district court judge has expressly identified the finding of professional misconduct as a sanction. The Third Circuit has ruled consistently with this approach, but the court

⁴ See *Precision Specialty Metals, Inc. v. United States*, 315 F.3d 1346, 1352-53 (Fed. Cir. 2003) (permitting an appeal of an order in which an attorney was explicitly reprimanded for violating Rule 11).

⁵ See *In re Williams*, 156 F.3d 86, 92 (1st Cir. 1998) (holding that attorneys may only appeal orders including findings "expressly identified as a reprimand" of the attorney's conduct).

avoided addressing the possible distinction between labeled sanctions and unlabeled findings of misconduct in its narrow opinion.⁶

Although, the Ninth Circuit has adopted the First and Federal Circuits' position in this regard, *see Weissman v. Quail Lodge, Inc.*, 179 F.3d 1194, 1200 (9th Cir. 1999), its approach appears more nuanced. *See United States v. Talao*, 222 F.3d 1133, 1137-38 (9th Cir. 2000) (allowing appeal from an order including a legal conclusion that a nonparty attorney violated a specific rule of ethical conduct). While the Ninth Circuit in *Weissman*, *supra*, adopted the First and Federal Circuits' approach, it later added a twist to this rule by treating certain findings of misconduct as a sanction despite their not being labeled as such.

In *Talao*, *supra*, the district court judge determined that an attorney had violated a specific state rule of ethical conduct. *Id.* at 1136. The Ninth Circuit held that a judge's conclusion that a nonparty attorney violated a specific rule of ethical conduct is a finding that per se constitutes a reviewable sanction. *Id.* at 1138.

The Seventh Circuit appears to be the only circuit which has stated (perhaps always in dicta) that only monetary sanctions imposed on an

⁶ *See Bowers v. National Collegiate Athletic Association*, 475 F.3d 524, 543-44 (3d Cir. 2007) (allowing appeal of an explicitly labeled public reprimand while reserving judgment on the propriety of appeals of nonlabeled findings of misconduct).

attorney are sufficient to invoke appellate standing by the third party attorney. *See Precision Specialty Metals, Inc. v. United States*, 315 F.3d 1346, 1352-53 (Fed. Cir. 2003) (Senior Judge Freidman contended it was not clear that the Seventh Circuit would deny an appeal to an attorney actually reprimanded for misconduct).

Stafne believes that as an Advocate and Officer of the Court who has institutional rights and obligations under our system of justice, he has sufficient rights and obligations to incur standing to challenge the illegality and unconstitutionality of statutory appellate proceedings before the Superior Court. *See Wash. Const. art. IV, § 6*. If as an attorney and officer of the court Stafne does not have sufficient interest in our justice system alone to confer standing to challenge obvious statutory violations, then certainly such standing must arise when Stafne is sanctioned for abandoning his clients by the Court for refusing to participate in an illegal appeal.

B. Reply to "Scott E. Stafne's failure to assign error to the decision of the superior court that petitioners did not have standing and that their appeal below is not moot"

In pages 9 through 12 of the District's Brief, the District contends that Stafne should have assigned error in this appeal to issues which apply only to his clients, *i.e.* standing and mootness. Stafne has no standing to do so. For as Washington appellate courts hold in the very appeals the

District cites, an attorney has no standing on his own behalf to litigate his clients' claims. See *Breda v. B.P.O. Elks Lake City*, 120 Wn. App. 351, 353, 90 P.3d 1079 (2004); *Johnson*, 91 Wn. App. 127.

Perhaps Judge Middaugh was familiar with these "standing" principles when she wrote the final judgment she did, and she knew that any standing or mootness problems the clients may have would not inure to a final judgment against Stafne for misconduct which dismissed the claims of his clients. Perhaps Judge Middaugh was seeking guidance from an appellate court, (as opposed to the Supreme Court Commissioner), as to whether the second sentence of RCW 28A.645.020 really means what it actually states.

In any event the ruling against Stafne is now squarely before this Court and the Court should determine for the School Board and lower Courts just what the words "[s]uch filings shall be certified to be correct" actually mean.⁷

⁷ It is worth noting that had the Superior Court required the District to comply with RCW 28A.645.020 when Appellants challenged its jurisdiction, the School Board decision would have been vacated and the long delayed arguments that Appellants had no standing and the appeal would never have been made.

V. Conclusion

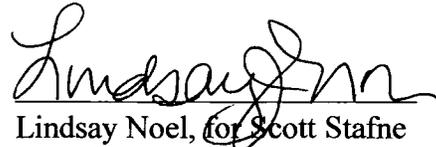
This Court should hold Stafne has standing to bring this appeal and reverse the Superior Court's final order dismissing Stafne's appeal because Stafne abandoned his claim. Further, this Court should hold that the second sentence of RCW 28A.645.020 requires the District to certify the Transcript of Evidence is correct. Finally, the decision of the School Board subject to this appeal should be vacated.

Respectfully submitted this 31st day of March, 2011.

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Appendix 1

FILED

Honorable Judge Laura C. Inveen
2010 OCT 18 11:4:25

KING COUNTY
SUPERIOR COURT CLERK
SEATTLE, WA
KING COUNTY, WASHINGTON

OCT 18 2010

SUPERIOR COURT CLERK
DEPUTY

SUPERIOR COURT OF WASHINGTON
IN THE COUNTY OF KING

9 GLORIA BRIGGS, et. al,

Appellants,

v.

12 SEATTLE SCHOOL DISTRICT NO. 1,

Respondents.

NO. 09-2-10708-4 SEA

Deny
ORDER GRANTING MOTION TO STRIKE
SECOND NOTICE OF LIMITED
APPEARANCE

[PROPOSED]

(NO ENVELOPES PROVIDED)

15 THIS MATTER having come before the above-entitled Court on Respondent Seattle
16 School District No. 1's ("the District") Motion to Strike the Second Notice of Limited Appearance
17 filed by Scott Stafne, and the Court, having considered the files and records herein, including:

- 18 1. The District's Motion to Strike the Second Notice of Limited Appearance filed by
- 19 Scott Stafne;
- 20 2. The Appellants' Response to Motion to Strike;
- 21 3. The Declaration of Scott E. Stafne in Support of Response to Motion to Strike
- 22 Stafne's Notice of Limited Representation, and

23 The District's Reply in Support of Motion to Strike the Second Limited Notice of Appearance,
24 and being otherwise fully advised, it is hereby ORDERED that:

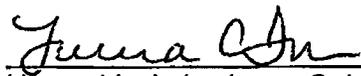
25
ORDER GRANTING MOTION TO STRIKE SECOND
NOTICE OF LIMITED APPEARANCE - 1
«Matter Matter ID» 226580.doc

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1 The District's Motion to Strike the Second Notice of Limited Appearance filed by Scott
2 Stafne is ~~GRANTED.~~ Denied. *

3 Appellants may be represented in this matter by counsel or they may represent
4 themselves. However, under no circumstances will this Court continue to accept filings and/or
5 hear arguments from both counsel of record and the Appellants as pro se parties
6 simultaneously. If the Appellants and/or Mr. Stafne do not wish to continue their attorney-client
7 relationship, the Appellants may provide the Court and the District with notice that they have
8 terminated Mr. Stafne's engagement and are proceeding in this matter as pro se litigants or Mr.
9 Stafne shall file and serve a Notice of Intent to Withdraw in accordance with Civil Rule 71.
10 Alternatively, if the Appellants engage new counsel, that counsel may file a Notice of
11 Substitution of Counsel. If no Notice of Termination, Notice of Intent to Withdraw, or Notice of
12 Substitution of Counsel is filed by Appellants, Mr. Stafne will continue to be recognized as
13 counsel of record for this matter, and no independent actions by the named Appellants will be
14 recognized by the Court.

15 DATED this 18 day of October, 2010.

16 

17 Honorable Judge Laura C. Inveen
18 King County Superior Court Judge

19 Presented by:

20 PREG O'DONNELL & GILLETT PLLC

21 
22 By Shannon M. McMinimee, WSBA #34471
23 Mark F. O'Donnell, WSBA #13606
24 Attorneys for Seattle School District No. 1

25 Although not controlling, the
court notes that counsel
Stafne similarly limited
his representation in
Oralley and Glascock vs.
Seattle School District
litigations to which the
School District did not
object. jcb

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The District's Reply in Support of Motion to Strike the
Second Limited Notice of Appearance, - 2

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