

FILED
SUPREME COURT
STATE OF WASHINGTON
5/25/2022 12:11 PM
BY ERIN L. LENNON
CLERK

IN THE SUPREME COURT OF THE STATE OF
WASHINGTON

CITY OF PROSSER,)
)
Respondent,) Supreme Court No. 100945-3
) COA No. 37889-6-III
)
)
v.)
) MOTION FOR EXTENSION
) OF TIME TO FILE
TEAMSTERS LOCAL 839;) PETITION FOR REVIEW
KENNETH JAMES LATSCH,)
)
Petitioners.)
)
_____)

1. IDENTITY OF MOVING PARTY

Petitioner Teamsters Union Local 839 is the moving party.

2. STATEMENT OF RELIEF SOUGHT

Petitioner moves the Court to grant an extension of time to file its Petition for Review under RAP 18.8(b).

MOTION FOR EXTENSION OF TIME TO
FILE PETITION FOR REVIEW - 1
Supreme Court No. 100945-3
COA No. 37054-2-III

3. FACTS RELEVANT TO MOTION

On May 19, 2022, Respondent filed its Petition for Review. It was filed 26 minutes late. By letter dated May 20, 2022, the Supreme Court Clerk issued a letter noting that the Petition for Review was due at 5:00 p.m. on May 19, 2022, but was not filed until 5:26 p.m. on May 19, 2022. Under GR 30(c), the filing was considered filed on May 20, 2022, and was, therefore, untimely. The letter advised that Respondent may file an extension of time in which to file the petition for review for review supported by an appropriate affidavit establishing good cause for the delay in filing the petition for review.

Respondent's law firm has an active litigation practice which involves frequent electronic filings primarily in federal court. Declaration of David W. Ballew at ¶¶ 5 - 7 . The firm has no record of ever having missed an electronic filing deadline. Ballew Dec. at ¶ 8.

Based on the volume of electronic filings, the firm has employed a staff member who has primary responsibility for

handling electronic filings. Ballew Dec. at ¶ 9. Approximately two months ago, the staff member who was primarily responsible for electronic filing left employment. Ballew Dec. at ¶ 10. The firm hired a former employee whose duties include the electronic filing. Ballew Dec. at ¶ 11.

That staff member was exposed to the Covid-19 virus and began a quarantine on May 17, 2022, See, Declaration of David W. Ballew at ¶¶ 12 - 15 and Exhibit 1. Another staff member, Jenny Haverkamp, reviewed the requirements for electronic filing and discussed those requirements with the attorney on both May 18 and 19, 2022. Ballew Dec. at ¶ 16 - 19 ; Declaration of Jenny Haverkamp at ¶ 3 – 6.

In that time, Ms. Haverkamp obtained the user id and log-in password for the firm's electronic filing account used on the Washington State Appellate Courts' Portal. Haverkamp Dec. at ¶ 7. On May 19, 2022 at approximately 4:30 p.m. Ms. Haverkamp began the log-in process. Haverkamp Dec. at ¶ 8. Multiple attempts to log-in were unsuccessful. Haverkamp Dec.

at ¶ 9 - 10. On the third attempt to log-in, Ms. Haverkamp received a response that firm's log-in password had expired. Haverkamp Dec. at ¶ 11. Ms. Haverkamp followed the web site prompts in an attempt to reset the password. Haverkamp Dec. at ¶ 12. Several attempts were unsuccessful. Haverkamp Dec. at ¶ 13 - 15. She was then prompted to enter the answer to a security question necessary to reset the firm's password. Haverkamp Dec. at ¶ 16 - 17. Next, she reviewed the electronic filing documentation of the firm in an effort to find the answer to the security question. Haverkamp Dec. at ¶ 18 - 19. When she was unsuccessful in locating that information, Ms. Haverkamp attempted to reach the clerk's office of the appellate court by telephone to request assistance. Haverkamp Dec. at ¶ 20. The clerk's office had already closed, however. *Id.*

Upset and emotional from the frustrations encountered, Ms. Haverkamp communicated with the undersigned prior to 5:00 p.m. regarding her inability to successfully log-on. Haverkamp Dec. at ¶ 22 - 24; Ballew Dec at ¶ 24 - 26. Once the

undersigned discerned what the issue Ms. Haverkamp was experiencing and how she was attempting to fix the issue, it was determined a new account could be created rather than the resetting the password of the firm account which had been historically used by the firm. Ballew Dec at ¶ 29. This action took several minutes due to difficulties in creating a password that met the Password Standards required to create an account. Ballew Dec at ¶ 30. Once the new account was created, the Petition for Review was filed at 5:26 p.m. Ballew Dec at ¶ 31 Haverkamp Dec. at ¶ 29 - 31.

4. GROUNDS FOR RELIEF

The authority of the Court to grant an extension of time is set forth in RAP 18.8. Under RAP 18.8 (a), the appellate court may enlarge the time within which an act must be done “in order to serves the ends of justice, subject to the restrictions of sections (b) and (c).”

Under RAP 18.8 (b), the appellate court may extend the time to file a petition for review, “only in extraordinary

circumstances and to prevent a miscarriage of justice”. While the standard under RAP 18.8 is “strict”, a full consideration of the circumstances can result in an extension being granted. *Scannell v. State*, 128 Wn.2d 829, 833 - 834 (Wash. 1996).

In examining whether the circumstances resulting in the delay, merits an extension under RAP 18.8(b), a primary factor considered is whether evidence exists to show that the litigant acted with “reasonable diligence” prior to a defective filing due to excusable error. *Scannell v. State*, 128 Wn.2d 829, 833 -834 (1996). To determine reasonable diligence, the amount of time that elapsed between the due date of the appeal and the date the appeal was ultimately filed has been noted as significant factor. For example, in *Reichelt v. Raymark Industries, Inc.*, 52 Wn. App. 763 (Wash. App. Div. 1 1988), the court noted that the attorneys for Raymark were unaware the deadline to appeal had passed until approximately 10 days after the 30-day appeal period expired when opposing counsel contacted Raymark's counsel regarding payment of the judgment. Counsel for

Raymark responded by immediately serving and filing a notice of appeal. *Id.* at 764 – 765. As part of the court’s broader analysis of whether Raymark had established that it acted with diligence, it was noted “nothing of record suggests that this matter would have resurfaced in counsel's mind within a ‘reasonable’ time if Reichelt had not contacted counsel for payment of the judgment.” *Id.* at pg. 766. Because Raymark could not establish that it acted with diligence, its motion to extend time was denied. *Id.*

In *Shumway v. Payne*, 136 Wn.2d 383 (1988), the amount of time between the due date and filing date was deemed significant even when the movant did not claim reasonable diligence, confusion about the method of seeking review, excusable error in interpreting the rules, or circumstances beyond her control. Instead, Shumway argued that, based on advice she had received, she did not believe review in the court was necessary for her to present her claims to the federal court. *Id.* at 396. The Court noted that the erroneous advice Shumway

received from an attorney regarding the effect of a Court of Appeals' decision on a different action in another jurisdiction was not an extraordinary circumstance, under RAP 18.8(b), to justify an extension of time “of more than one year” for filing a petition for review. *Id. at* 396 – 397.

On the other hand, in *Scannell v. State*, 128 Wn.2d 829 (Wash. 1996), the Court granted an extension of time under RAP 18.8(b) to file a notice of appeal when the appeal was filed nearly two months late. There, the Court determined that several factors supported the motion for extension of time focusing on the movant’s confusion over the filing deadline for a notice of appeal that was caused by his understandable misinterpretation of a recently amended court rule. *Id at* 834. The Court concluded that the misinterpretation was “clearly an innocent mistake” and the movant had made “good faith efforts to satisfy the rules’ requirements.” *Id.* Finally, the Court noted that “the end result is drastic: Scannell loses his filing fee and loses any chance to

appeal, an opportunity which he had otherwise diligently pursued.”

It is respectfully submitted that the circumstances of this case meet the strict standards of RAP 18.8(b) meriting an extension of time to file the petition for review.

The failure to meet the 5:00 p.m. deadline was not for lack of care or effort. Active and practical efforts were taken to utilize the firm’s account on the Washington State Appellate Courts’ Portal and staff’s exercise of diligence to remedy the log-in issues and reset the password by locating the answer to a security question rather than immediately realizing that creating a new account was possible.

Like in *Scannell*, under the unique circumstances here, the mistake of not knowing that the password had expired was not for lack of reviewing the filing requirements. Ms. Haverkamp genuinely believed that she had all of the information necessary to log into the firm’s filing portal, including the firm’s user id and password, only to learn that the password expired and could

only be reset by answering a security question which she did not know the answer to. Efforts began prior to 5:00 p.m. to determine how to remedy the problem and by the time a solution was discovered the 5:00 p.m. deadline had passed.

To paraphrase Scannell, the failure to discover that the firm's password had expired was "clearly an innocent mistake" and the Respondent had made "good faith efforts to satisfy the rules' requirements."

Respondent has diligently pursued this appeal from the Superior Court to the Court of Appeals. Given the showing of the exercise of reasonable diligence to timely meet the filing deadline of the Petition for Review given the unique circumstances here, dismissing the Petition based on the 26-minute delay in timely filing would not be in keeping with the purpose of RAP 18.8.

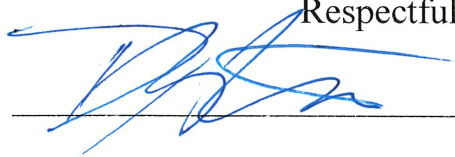
Respondent requests that the Court grant this motion to extend the time to file the Petition for Review as authorized under RAP 18.8.

MOTION FOR EXTENSION OF TIME TO
FILE PETITION FOR REVIEW - 10
Supreme Court No. 100945-3
COA No. 37054-2-III

This document contains 1703 words, excluding the parts
of the document exempted from the word count by RAP 18.17.

May 24, 2022

Respectfully submitted,



David W. Ballew

Attorney for Appellant Teamsters Local 839

WSBA #17961

MOTION FOR EXTENSION OF TIME TO
FILE PETITION FOR REVIEW - 11
Supreme Court No. 100945-3
COA No. 37054-2-III

IN THE SUPREME COURT OF THE STATE OF
WASHINGTON

CITY OF PROSSER,)
)
 Respondent,) Supreme Court No. 100945-3
) COA No. 37889-6-III
)
 v.) DECLARATION OF
) DAVID W. BALLEW
) IN SUPPORT OF
) MOTION FOR EXTENSION
) OF TIME TO FILE
 TEAMSTERS LOCAL 839;)
 KENNETH JAMES LATSCH,)
)
 Petitioners.)
 _____)

I, David W. Ballew, say and declare as follows:

1. I make the following statements based upon my own personal knowledge and, if called upon to do so, could and would competently testify thereto under oath.
2. I am a partner with Reid, McCarthy, Ballew & Leahy.
L.L.P. (“RMBL”)

DECLARATION OF DAVID W. BALLEW RE
MOTION FOR EXTENSION OF TIME - 1
Supreme Court No. 100945-3
COA No. 37054-2-III

3. I am the attorney for Teamsters Local 839 and have represented the Local in this case since the initial arbitration which is the subject of the case.
4. RMBL includes four attorneys and three support staff.
5. A significant area of our practice includes the representation of Taft-Hartley Trust Funds throughout the West Coast on cases under ERISA, 20 U.S.C. § 1001 et. seq.
6. Our firm regularly files collection actions on behalf of ERISA Trusts against participating employers which have failed to meet a contribution obligation.
7. These cases are generally in federal court and all such cases are initiated and processed through electronic filing systems of the courts.
8. RMBL has no record of ever having missed an electronic filing with a court.

9. Based on the volume of electronic filings, RMBL has employed a staff member who has primary responsibility for handling electronic filings.
10. Approximately two months ago, the staff member who was primarily responsible for electronic filing left employment.
11. RMBL hired a former employee whose duties include the electronic filing.
12. On Tuesday, May 17, 2022, that employee notified the firm that she had been exposed to Covid and that her son was infected.
13. The employee requested guidance as to whether she should quarantine or report to work with a mask.
14. The partnership responded and informed the employee that she should quarantine for the remainder of the work week.
15. A true and correct copy of the email exchange between the firm and that employee is attached as Exhibit 1. Because

of the health information imparted in the email, the last name of the employee has been redacted and she is identified as “Jennifer Z.”

16. Just prior to noon on Wednesday May 18, 2022, I spoke with my secretary, Jenny Haverkamp, regarding details of the filing of the underlying Petition for Review.

17. We discussed several aspects of the filing including the need to utilize the electronic filing system of the Court.

18. Ms. Haverkamp had already begun to apprise herself of the filing electronic filing requirements of the Court.

19. On Thursday May 19, 2022, Ms. Haverkamp and I spoke several times throughout the day regarding the filing of the Petition for Review.

20. During a phone call at approximately 2:20 p.m., Ms. Haverkamp noted that she had once again reviewed the filing requirements and was retrieving the password utilized by the firm for the log-in process.

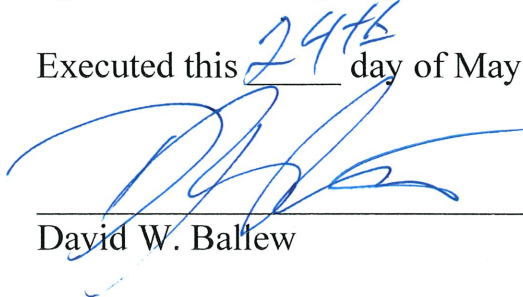
21. At approximately 4:20 p.m. I spoke with Ms. Haverkamp by telephone regarding the filing and she reported that she was starting the process of accessing the Court website for filing.
22. As 5:00 p.m. approached I called again because I had not received notice of the filing.
23. During this call, I spoke with my partner Jack Holland who reported that Ms. Haverkamp was on the phone with RMBL's ERISA paralegal regarding an issue she was having on the Court's website.
24. Ms. Haverkamp called me back at approximately 4:55 p.m.
25. Ms. Haverkamp was quite emotional and reported that her attempt to log-in to the website failed because the firm's password had expired. She reported that to reset the password, she needed to answer to the security question which she had been attempting to locate but could not find.

26. She informed me that she had attempted to reach the Court by phone, but it was closed.
27. I placed a call to the former employee who would have set the password in an effort to get the answer to the security question.
28. I did not receive an answer to that call.
29. I called Ms. Haverkamp back. While on that call, I logged onto the Washington State Appellant's Court Portal and determined that it may be possible to create a new account under my name rather than a firm account has had been historically used by RMBL.
30. The process of creating a new account took several minutes as I made numerous unsuccessful attempts to create a password that met the Password Standards required to create an account.
31. Once I successfully created the new account, the Petition for Review was electronically filed.

This document contains 854 words, excluding the parts of the document exempted from the word count by RAP 18.17.

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

Executed this 24th day of May 2022.



David W. Ballew

DECLARATION OF DAVID W. BALLEW RE
MOTION FOR EXTENSION OF TIME - 7
Supreme Court No. 100945-3
COA No. 37054-2-III

EXHIBIT 1
To
Declaration of
David W. Ballew

From: [Jack Holland](#)
To: [Jennifer Z](#); [Russ Reid](#); [David Ballew](#); [Tom Leahy](#)
Cc: [Shelly Azus](#)
Subject: RE: My son has covid and I have been exposed. Should I come to work or stay home?
Date: Tuesday, May 17, 2022 11:11:15 AM

Jennifer,

I am sorry to hear that [REDACTED] has tested positive for Covid. I hope it is just a mild case and it passes quickly.

As to your question re your exposure, we believe the safest option is for you to isolate for 5 days.

Please keep us informed if you do develop symptoms and/or test positive. Let's plan to check in on Friday.

Jack

Jack Holland

Reid, McCarthy, Ballew & Leahy, L.L.P.

100 West Harrison Street
North Tower, Suite N-300
Seattle, WA 98119
(206) 285-3610, ext. 235
(206) 285-8925
jack@rmbllaw.com | www.rmbllaw.com

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From: Jennifer Z <[REDACTED]@gmail.com>
Sent: Tuesday, May 17, 2022 8:49 AM
To: Russ Reid <rjr@rmbllaw.com>; David Ballew <David@rmbllaw.com>; Tom Leahy <Tom@rmbllaw.com>; Jack Holland <Jack@rmbllaw.com>
Cc: Shelly Azus <Shelly@rmbllaw.com>
Subject: My son has covid and I have been exposed. Should I come to work or stay home?

Hello All,

My son [REDACTED] tested positive for covid this morning with an at-home test. He has a sore throat, cough, and fatigue. I just tested negative for covid with an at-home test and have no symptoms. I picked up Jack from his after-school program yesterday, about 17 hours ago.

My ex-husband M [REDACTED] tested positive for covid last night with an at-home test. [REDACTED] was with him all weekend.

EXHIBIT 1 TO DECLARATION OF DAVID W. BALLEW

I am fully vaccinated with one booster.

I am seeking guidance about whether you would prefer I quarantine for 5 days, etc. or come to the office with a mask.

Please advise.

Thanks,

Jennifer J. [REDACTED]
206-276-4021
[REDACTED]@gmail.com

IN THE SUPREME COURT OF THE STATE OF
WASHINGTON

CITY OF PROSSER,)
)
 Respondent,) Supreme Court No. 100945-3
) COA No. 37889-6-III
)
 v.) DECLARATION OF
) JENNY HAVERKAMP
) IN SUPPORT OF
) MOTION FOR EXTENSION
) OF TIME TO FILE
 TEAMSTERS LOCAL 839;)
 KENNETH JAMES LATSCH,)
)
 Petitioners.)
 _____)

I, Jenny Haverkamp, say and declare as follows:

1. I make the following statements based upon my own personal knowledge and, if called upon to do so, could and would competently testify thereto under oath.
2. I am employed as a Legal Assistant by Reid, McCarthy, Ballew & Leahy. L.L.P.

DECLARATION OF JENNY HAVERKAMP RE
MOTION FOR EXTENSION OF TIME - 1
Supreme Court No. 100945-3
COA No. 37054-2-III

3. On May 18, 2022, I spoke with attorney David Ballew regarding the filing of the Petition for Review Mr. Ballew was preparing in this case.
4. I understood that I would be filing the Petition with the Court in the absence of other staff who was absent that day and would be absent the following day as well when the Petition was due.
5. Following my conversation with Mr. Ballew regarding the filing of the Petition for Review on May 18, 2022, I reviewed the Washington Rules of Appellate Procedure. Although I had previously reviewed those rules during the appeal of this case regarding the formatting and other aspects of the filing process, I reviewed them again with an emphasis on filing requirements.
6. On May 19, 2022, I had several telephone conversations with Mr. Ballew regarding the filing of the Petition for Review.

DECLARATION OF JENNY HAVERKAMP RE
MOTION FOR EXTENSION OF TIME - 2
Supreme Court No. 100945-3
COA No. 37054-2-III

7. I informed him that I had retrieved the user id and password for the firm's account on the Washington State Appellant's Court Portal.
8. Later that day at approximately 4:30 p.m., I accessed the Washington State Appellant's Court Portal for the purpose of electronically filing the Petition for Review.
9. When I entered into the Washington State Appellant's Court Portal the firm's user id and password and clicked "login", a message appeared stating "Your attempt to Log on Failed."
10. Next, I immediately attempted to re-enter the firm's user id and password into the appropriate fields, clicked "login," and again a message appeared stating, "Your attempt to Log on Failed."
11. Immediately thereafter, I attempted for a third time to enter the firm's id and password into the appropriate fields, clicked "login," and a message

appeared stating “Your attempt to Log on Failed” and “Your password has Expired” (along with a “Reset Your Password” hyperlink).

12. I then clicked the “Reset Your Password” hyperlink, which took me to a webpage with the words “Password Change Request” across the top banner and fields for entry regarding User ID, Email Address and Current/Expired Passwords.
13. I then entered same id and password as I had previously entered (and was denied) into the fields titled User ID and Current/Expired Passwords, and in the Email Address field, I entered the email address of attorney David W. Ballew (David@rmbllaw.com). I then clicked “submit.”
14. After clicking “submit,” the webpage reloaded with a red notification with the words to the effect of “the email you entered does not match this account.”

15. Based on the response I received (that is, that David Ballew's email address was not the email address assigned to the User ID), I entered into fields on the Password Change Request page the same id and password as I had previously entered, but entered a different email address in the Email Address field—specifically, the email address of my coworker, Shelly Azus (Shelly@rmbllaw.com) who I believed could have originally created our firm's account and linked her email address to the firm's id. I clicked "submit," but again, the webpage reloaded with a red notification with the words to the effect of "the email you entered does not match this account."
16. I immediately attempted for a third time to re-set the password—I entered into fields on the Password Change Request page the same id and password as I had previously entered, but I entered the email address of former coworker, Shelly Trahin

(ShellyT@rmbllaw.com) who I believed might have originally created our firm's account and linked her email address to the firm's id.

17. I clicked "submit," and the webpage reloaded to a screen that contained a security question: "What is the name of your oldest sibling's dog?"
18. Then, I ran to Shelly Trahin's old workstation and located a thick file that she had maintained which contained login information, access passwords and written instructions for various courts and administrative agencies.
19. However, I was unable to locate the answer to the password re-set question.
20. I placed a call to the office of Division III in the hope I could reach the Clerk/Administrator, however, the office was closed.

21. Despite reviewing the Rules and information regarding electronic filing on May 18, 2022, I was not aware that passwords expire every 90 days.
22. I was becoming upset and extremely flustered by the situation.
23. Next, at approximately 4:50 p.m., I called my coworker Shelly Azus on her cell phone and asked her (a) whether she knew the answer to the security question (she did not) and (b) how to proceed under the circumstances – to which Shelly advised that I contact David W. Ballew.
24. At approximately 4:53 p.m., I called David W. Ballew and informed him of the problem with the password and what I had tried to fix the issue.
25. Mr. Ballew said that he would try to contact the former employee (Shelly Trahin) of the firm who had previously had primary responsibility for

electronic filing and request the answer to the security question.

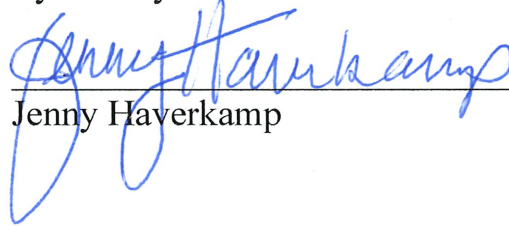
26. At approximately 4:58 p.m., Mr. Ballew called back and said he was not able to reach Shelly Trahin.
27. Mr. Ballew then told me that he would try to open a new account as an individual account.
28. While on the phone with me, Mr. Ballew began the process of creating a new user registration on the Courts' Portal webpage—specifically, by clicking “Register as an Individual”—which resulted in the creation of a new user id (Rmb13610) and password. This phone call lasted approximately 15 minutes.
29. At 5:11 p.m., I received an email from doNotRespond@courts.wa.gov that included steps to activate the account Mr. Ballew had just created.
30. I immediately activated the account and then began the process of electronically filing the Petition for Review and Declaration of Service.

31. At 5:26 p.m., I received confirmation that the Petition for Review had been uploaded, and at 5:27 p.m., I received confirmation that the Declaration of Service had been uploaded.

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

This document contains 1150 words, excluding the parts of the document exempted from the word count by RAP 18.17.

Executed this 24th day of May 2022.



Jenny Haverkamp

IN THE SUPREME COURT OF THE STATE OF
WASHINGTON

CITY OF PROSSER,)
)
Respondent,) Supreme Court No. 100945-3
) COA No. 37889-6-III
)
v.) CERTIFICATE OF
) SERVICE OF
) MOTION TO EXTEND
TEAMSTERS LOCAL 839;) TIME AND RELATED
KENNETH JAMES LATSCH,) DECLARATIONS
)
Petitioners.)
_____)

I hereby certify that on the 25th day of May, 2022, I filed Teamsters Local 839's Motion for Extension of Time to File Petition for Review, Declarations of David W. Ballew and Jenny Haverkamp in Support of Motion to File Petition for Review, and this Certificate of Service, electronically in the Supreme Court of the State of Washington via the Washington State Appellate Court Portal and served a true and correct copy of same via electronic mail (pursuant to the parties' agreement for service by electronic mail) upon:

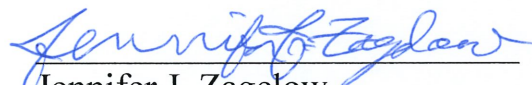
CERTIFICATE OF SERVICE
MOTION FOR EXTENSION OF TIME
Supreme Court No. 100945-3
COA No. 37054-2-III

Lance King
Attorney for Respondent
lking@lancekinglaw.com

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

This document contains 200 words, excluding the parts of the document exempted from the word count by RAP 18.17.

DATED this 25th day of May, 2022.


Jennifer J. Zagelow
Office Assistant

REID MCCARTHY BALLEW LEAHY LLP

May 25, 2022 - 12:11 PM

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: 100,945-3
Appellate Court Case Title: City of Prosser v. Teamsters Union Local 839, et al.
Superior Court Case Number: 19-2-01411-1

The following documents have been uploaded:

- 1009453_Motion_20220525121006SC000398_3304.pdf
This File Contains:
Motion 1 - Extend Time to File
The Original File Name was Mtn Ext Time Local 839 Supreme Ct.pdf

A copy of the uploaded files will be sent to:

- jenniferz@rmbllaw.com
- lancek4@aol.com
- lking@lancekinglaw.com

Comments:

Sender Name: Jennifer Zagelow - Email: jenniferz@rmbllaw.com

Filing on Behalf of: David W. Ballew - Email: david@rmbllaw.com (Alternate Email: shellyt@rmbllaw.com)

Address:
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Seattle, WA, 98119
Phone: (206) 285-3610 EXT 226

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