

FILED
SUPREME COURT
STATE OF WASHINGTON
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NO. 103,398-2

SUPREME COURT OF THE STATE OF WASHINGTON

WASH. ELECTION INTEGRITY COALITION UNITED,
DOUG BASLER AND TIMOFEY SAMOYLENKO,
Appellants/Petitioners,

v.

JULIE WISE, King County Director of Elections, AND KING
COUNTY, and WASHINGTON STATE DEMOCRATIC
CENTRAL COMMITTEE,
Respondents,

**KING COUNTY RESPONDENTS' RESPONSE TO
STATEMENT OF ADDITIONAL AUTHORITIES**

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WEICU cites *In re Dependency of A.H., LL. And S.O.-W.*, __ Wn.2d __, 2024 WL 3976004 (No. 102558-1, August 29, 2024), as additional authority. However, that case has no bearing on the long-standing common law rule that corporations have no right to self-representation. Nor does it involve interpretation of CR 11.

The only thing that *A.H.* and this case have in common is both cases involve an issue regarding a signature. The similarities end there. In *A.H.* this Court interpreted RCW 13.04.033(3), which governs appellate review of juvenile court decisions. The question for this Court was whether that statute required an attorney to obtain a signed sworn statement from the client in order to comply with a statutory requirement of “specific direction” to seek review. *Id.* at *5. This Court held that the plain language of the statute requires a client’s specific direction to seek review, but does not require a signed and sworn statement to that effect. *Id.* at *6-7.


In the present case, Division One applied the long-standing common law rule that corporations have no right to self-representation and the plain language of CR 11 that when a party is represented by an attorney all pleadings must be signed by the attorney. *See King County Respondents' Answer to Petition for Review*, at 16-24. WEICU's novel argument that the Civil Rules have no application to PRA lawsuits is unsupported by any statute, this Court's cases, or logic. *See e.g. Neighborhood Alliance of Spokane County v. Spokane County*, 172 Wn.2d 702, 716, 261 P.3d 119 (2011).

In re A.H. is inapposite, and does not lend support to WEICU's petition. This case does not meet the standards for review by this Court. The petition for review should be quickly denied.

I certify that this document contains 289 words excluding the parts of the document exempted from the word count by RAP 18.17.

DATED this 4th day of September, 2024.

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Appellate Court Case Title: Washington Election Integrity Coalition, et al. v. Julie Wise, et al.

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