

FILED
SUPREME COURT
STATE OF WASHINGTON
1/29/2025 12:03 PM
BY ERIN L. LENNON
CLERK

No. 1035209

THE SUPREME COURT
OF THE STATE OF WASHINGTON

ERIC HOOD

Appellant

v.

CITY OF LANGLEY,

Respondent.

ANSWER TO COURT CLERKS MOTION TO STRIKE
REPLY

Eric Hood, Pro Se
PO Box 1547
Langley, WA 98260
360.632.9134

TABLE OF CONTENTS

I.	INTRODUCTION	2
II.	FACTS	2
III.	ARGUMENT	3
	A. This Court may review City’s dishonesty.....	3
	B. This Court should review City’s dishonesty.....	4
IV.	CONCLUSION.....	4

TABLE OF AUTHORITIES

Cases

<i>Blaney v. Int’l Ass’n of Machinists</i> , 151 Wn. 2d 203, 210 n.3 (Wash. 2004)	3
<i>Kruse v. Hemp</i> , 121 Wn. 2d 715, 721 (Wash. 1993).....	3
<i>Seattle v. Mccready</i> , 123 Wn. 2d 260, 269 (Wash. 1994)	3

I. INTRODUCTION

This Court may and should review City's claim that this Court cannot review lower court findings based on City's lies.

II. FACTS

On January 27, 2025, Hood replied to City's claim that Hood may not challenge the trial court's findings. *1/27/25 Reply To Hood's Amended Petition For Review* ("Reply") (trial court's contradictory findings were based on its untenable application of precept of dishonesty).

The same day, the Court Clerk filed a motion to strike Hood's Reply on the basis that

it does not appear that the answers to the petition for review sought review of any issues. Accordingly, it is unlikely that the Petitioner is entitled to file a reply.

1/27/25 Letter.

III. ARGUMENT

A. This Court may review City's dishonesty

Whether City "sought review" of the issues it raised is irrelevant to whether Hood was "entitled" to reply to them. *Id.*

RAP 13.4(d) and 13.7(b) do not require [a party to] affirmatively seek review. The rules merely require that the issue be raised.

Blaney v. Int'l Ass'n of Machinists, 151 Wn. 2d 203, 210 n.3 (Wash. 2004) (quotation marks omitted).

Furthermore, this Court has "the authority to determine whether a matter is properly before it, and to perform all acts necessary or appropriate to secure the fair and orderly review of a case." RAP 7.3. *And see Seattle v. Mccready*, 123 Wn. 2d 260, 269 (Wash. 1994); *Kruse v. Hemp*, 121 Wn. 2d 715, 721 (Wash. 1993).

The issues raised by City's Answer are fundamental to justly deciding this case, thus:

B. This Court should review City's dishonesty

“The end of litigation is justice. Knowledge of the truth is essential thereto.” *Union Pacific Railway Co. v. Botsford*, 141 U.S. 250, 258 (1891)

In accordance with *all* evidence, Hood showed that City dishonestly withheld the calendars, and then its agents -- officers of the court -- dishonestly defended City's withholding. City did not dispute that evidence because it cannot. City counsel's *current* claim that its fabrications are unchallengeable “verities” repeats its successful, subversive strategy: hide behind lower court rulings it obtained through lies and misrepresentation.

IV. CONCLUSION

This Court has *multiple* grounds on which it may deny Hood's petition or his reply. Thus, the issue is not whether this Court *may* but whether it *will* review the City insurer-appointed counsel's dishonest efforts to undermine the PRA.

This Court should permit Hood's reply.

This document contains 395 words, excluding the parts
of the document exempted from the word count by RAP 18.17
DATED this 29th day of January, 2025, by,

s/Eric Hood
Eric Hood
PO Box 1547
360.632.9134
Langley, WA 98260
ericfence@yahoo.com

Pursuant to RCW 9A.72.085, the undersigned hereby certifies
under penalty of perjury according to the laws of the State of
Washington that on the date below the foregoing was delivered
to the following persons via email: Jessica Goldman.

Signed by:

Date: January 29, 2025

s/Eric Hood
Eric Hood
PO Box 1547 360.632.9134
Langley, WA 98260
ericfence@yahoo.com

ERIC HOOD

January 29, 2025 - 12:03 PM

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: 103,520-9
Appellate Court Case Title: Eric Hood v. City of Langley
Superior Court Case Number: 16-2-00107-1

The following documents have been uploaded:

- 1035209_Answer_Reply_20250129120302SC414212_3738.pdf
This File Contains:
Answer/Reply - Answer to Motion
The Original File Name was 2025 01 29 Ans. to M2 strike Reply W COVER.pdf

A copy of the uploaded files will be sent to:

- jessicag@summitlaw.com
- sharonz@summitlaw.com

Comments:

Sender Name: Eric Hood - Email: ericfence@yahoo.com
Address:
PO Box 1547
Langley, WA, 98260
Phone: (360) 321-4011

Note: The Filing Id is 20250129120302SC414212