

FILED
SUPREME COURT
STATE OF WASHINGTON
12/2/2024 11:50 AM
BY ERIN L. LENNON
CLERK

WASHINGTON STATE SUPREME COURT

ERIC HOOD,

Appellant

, v.

CITY OF LANGLEY,

Respondent.

No. 1035209

MOTION TO STAY

I. MOTION AND RELIEF SOUGHT

Hood's unresolved lawsuits against City of Langley defended by insurer-appointed attorneys provide this Court with an opportunity to address lower courts' role in the deterioration of government transparency. To that end, to promote judicial economy and justice, and avoid piecemeal review, Hood requests this Court stay its decision here until after those lawsuits have been decided, and then holistically consider all of them.

II. FACTS

Hood's concurrently filed petition for review summarized stratagems typically employed by City's insurer-appointed attorneys and showed how lower courts have enabled them.

City's insurer-appointed attorneys used similar stratagems to defend City in two other lawsuits pending in Division 1.

III. ARGUMENT

Hood's other cases on appeal in Division 1 involve similar issues, viz., lower courts enabling City's insurer-appointed attorneys' misrepresentations of fact and law. City's current insurer-appointed attorney has a personal vested interest in unnecessarily complexifying these cases. CP 2425 (" \$545 per hour"). *And see* concurrently filed *Reply To Motion For Extension Of Time To File Petition For Review*.

Where "issue[s] may arise again [...] it is in the interests of judicial economy for us to address it here." *Dragonslayer v. Washington*, 139 Wn. App. 433, 442 (Wash. Ct. App. 2007)

This court may “make orders for the advancement, conduct, and hearing of actions.” CR 77(k).

The Court of Appeals retains authority to act in a case pending before it until review is accepted by the Supreme Court, unless the Supreme Court directs otherwise.

RAP 7.3

Except where prohibited by statute, in other civil cases [...] the appellate court has authority, before or after acceptance of review, to stay enforcement of the trial court decision upon such terms as are just.

RAP 8.1 (3)

This Court has “the power to administer justice whether any previous form of remedy had been granted or not.” *In re Bruen*, 102 Wash. 472, 476, 172 P. 1152 (1918).

Judicial economy, efficiency and justice, CR 1, is best served considering all pending cases together.

To review these cases piecemeal is contrary to this Court’s preference that PRA cases be reviewed “holistic[ally] [to] facilitate meaningful appellate review.” *Hoffman v. Kittitas County*, 194 Wn.2d 217, 228, 449 P.3d 277 (2019).

IV. CONCLUSION

For the above reasons, this Court should stay its decision in this case until Hood's pending cases versus City have been decided below, and then review them holistically.

This document contains 393 words, excluding the parts of the document exempted from the word count by RAP 18.17

DATED this 2nd day of December, 2024, 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: December 2, 2024

s/Eric Hood

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

CERTIFICATE OF SERVICE

I certify under the penalty of perjury under the laws of the State of Washington that on July 22, 2024 in Langley, WA Washington, I emailed the foregoing documents to: Matthew Barber

By: /s Eric Hood Date: July 24, 2024
ERIC HOOD

ERIC HOOD

December 02, 2024 - 11:50 AM

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_20241202114653SC542267_9157.pdf
This File Contains:
Answer/Reply - Reply to Answer to Motion
The Original File Name was 2024 12 02 reply to m2ext w app..pdf
- 1035209_Motion_20241202114653SC542267_7494.pdf
This File Contains:
Motion 1 - Stay
The Original File Name was 2024 12 02 final M2 stay.pdf
- 1035209_Petition_for_Review_20241202114653SC542267_5797.pdf
This File Contains:
Petition for Review
The Original File Name was 2024 12 02 final p4r to file.pdf

A copy of the uploaded files will be sent to:

- ericfence@yahoo.com;ucopian@gmail.com
- 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 20241202114653SC542267