

FILED
SUPREME COURT
STATE OF WASHINGTON
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BY SARAH R. PENDLETON
CLERK

SUPREME COURT CASE No. 1040831

COURT OF APPEALS, DIVISION I CASE No. 870831-1

SUPREME COURT OF THE STATE OF WASHINGTON

M.G., SAMANTHA GERLACH and SUZANNE GERLACH

Petitioners

v.

BAINBRIDGE ISLAND SCHOOL DISTRICT, HOSA, et al.

Respondents

PETITIONERS' REPLY FOR ADDITIONAL AUTHORITIES AND
EVIDENCE TO THE WASHINGTON STATE SUPREME COURT

Marcus Gerlach WSBA # 33963
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I. DIVISION I DEMONSTRATED BIAS AND PREJUDICE

Division I demonstrated bias by making false claims in their July 8, 2025 document. Biased, conflicted and compromised judges are matters of public concern and cast more doubt on tainted opinions. Division I's document, signed under penalty of perjury, stated: "The opinion has been filed and the time had passed to seek reconsideration." Plaintiffs filed reconsideration in Division I Cases #868462 and #870840 on April 13, 2025. Division I denied reconsideration on May 2, 2025. Division I's alleged violation of RCW 9A.72 may require referral for prosecution. Division I's administrator also inaccurately claimed, "In addition, it could be viewed as an attempt to influence the judges with matters outside the record." Again, Division I made false claims based on speculation, which demonstrated bias and prejudice against Plaintiffs and Plaintiffs' counsel. Finally, Division I's administrator alleged Plaintiffs' counsel's argument could result in targeting of Division I's family and could be a serious threat as reported in the National Judicial College (2024). Division I's biased claims were unsupported by facts or evidence. Instead, Division I relied on inadmissible hearsay evidence to bolster their prejudice. Evidence Rule 802 precludes hearsay.

Prior to Division I's July 8, 2025 false claims demonstrating bias against Plaintiffs' counsel, Division I manufactured facts in Cases #868462 [and #870831], which was the basis for the reconsideration. Division I also relied on the factually inaccurate declarations of Jennifer Forbes and Patricia Charnas in Case #870840, resulting in reconsideration of Division I's biased decisions. *The compilation of manufactured facts, false claims and allegedly fraudulent declarations now mandates review and reversal by the Washington State Supreme Court ("WSSC").*

Further evidence of bias can be found in case #873440 in Division I's refusal to issue an order regarding actual disclosure of personally identifiable information ("PII") by Bainbridge Island School District ("BISD") and Division I's refusal to set the date for argument despite three letters (Appx A-C) mandated Plaintiff's motion to transfer to Division III. Division I's confusion about PII is disconcerting. (Appendix D Declaration M. Neccochea ¶17)

The vociferous protests from Defendants, who disregarded Code of Judicial Conduct ("CJC") Rule violations, merely because Division I re-wrote laws to favor Defendants, is unconvincing. It is the duty of judges, *not the Plaintiffs*, to comply with CJC Rules. Alleged rule violations may result in referrals to state agencies.

II. DIVISION I'S BIASED DECISIONS MADE NEW LAWS

Division I made biased claims of potential “serious threats” while simultaneously re-writing existing law. RCW 4.105.010(3) exceptions expressly precluded targeted defamation that was criminal in nature, damaged reputation and violated RCW 49. Each exception applied, but Division I’s prejudice against Plaintiff’s counsel precluded proper application to the cases.

It is ironic that Division I filed a false document against Plaintiff’s counsel for “potential” harm, when Division I’s published decision exposed Plaintiffs to actual harm *and actually allows the harm complained about*. It has wide implications.

Division I’s attack on Plaintiff’s counsel belies their failure to apply CR 56(e) to the allegedly false declarations of Jennifer Forbes and Patricia Charnas, which were made in bad faith [CR 56g)]. Division I’s claims against Plaintiffs’ counsel were likewise made in bad faith and requires WSSC review.

Division I’s failure to properly apply the law to cases should be of significant concern. Plaintiffs’ apprehension is not unique. (Appendix E Declaration of Harold Franklin Jr. ¶11) Division I creates bad law by abusing its position and acting outside the rules by making false claims, just to penalize Plaintiffs.

III. WSSC PREVIOUSLY DECLINED CONFLICT CASES

WSSC's prior declination to address CJC conflicts regarding Kitsap County Superior Court ("KCSC") judges, resulted in the conflicts now alleged in WSSC Cases #1040831, #1040822 and 1040849. In 2025, WSSC ignored alleged CJC rule violations in *M.G. v BISD* 4 Wash.3d 1002, 561 P.3d 739 (2025) and excused alleged misconduct resulting in further wrongdoings in other cases.

KCSC Judge Jennifer Forbes established a pattern regarding alleged CJC Rule violations, including the alleged violations *deliberately omitted by Division I*. (See Appendix F Declaration of Leslie Weber ¶4) Division I's opinions allowed and permitted alleged perjury and defamation empowering at least one defendant. (Appx F ¶ 9) WSSC must review all of Division I's cases regarding Plaintiffs and Plaintiffs' counsel based on Division I's apparent malice towards Plaintiffs and Plaintiffs' counsel.

If WSSC had accepted review of KCSC's flawed decision in *Gerlach v City of Bainbridge* 182 Wash.2d 1025 (2015), regarding the obvious appearance of fairness violation, the subsequent WSSC cases would not likely be before this Court. Failure to require compliance with CJC Rules begets more cases to the WSSC. Division I's bias in #873440 requires review.(Appx A-C)

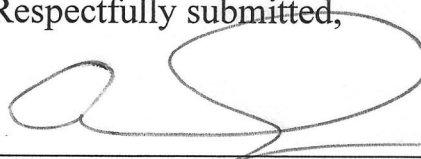
In each instance, WSSC is required to address deficiencies by KCSC and Division I. Without review by WSSC, CJC Rule violations will continue to be unheeded by KCSC and Division I, hindering actual justice.

IV. CONCLUSION

Division I violated CJC Rules and issued flawed decisions based on malice. Because of Division I's continued acts of personal prejudice, Plaintiffs will continue to seek WSSC review. The instant cases mandate automatic reversal, simply based on Division I's ill-conceived actions.

Dated: August 28, 2025

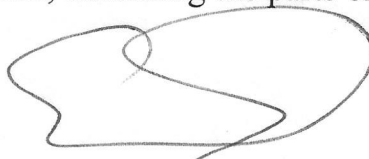
Respectfully submitted,



Marcus Gerlach WSBA # 33963
Attorney for Appellants

CERTIFICATE OF COMPLIANCE

This document contains 845 words, excluding the parts of the document exempted by RAP 18.17.



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APPENDIX D

DECLARATION OF MICHAEL NECOCHEA

I am not a party in the above-captioned case. I am personally familiar with the facts and information referenced herein. I provide this declaration based upon personal knowledge.

- 1) I am the owner and operator of Michael Necochea Security and Investigations (MNSI). I established MNSI in 2013.
- 2) In 1983, I earned my Bachelor of Arts in sociology from the University of San Diego, California.
- 3) From 1983 to 1989, I was employed as a police officer with the San Diego Police Department (SDPD). I performed patrol investigations and was a primary response team member with the Special Weapons And Tactics (SWAT) unit.

Page 1

Declaration of Michael Necochea

Marcus Gerlach, SBN 33963

579 Stetson Place

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- 4) During my employment as a San Diego police officer, I responded to countless radio calls for service regarding assaults, battery and criminal threats. I conducted many investigations regarding subjects who made threats of violence and/or committed criminal acts of violence.
- 5) In 1989, I was hired by the Federal Bureau of Investigation (FBI), and was assigned to the San Francisco Division. I investigated general criminal matters, organized crime, drug violations, domestic and international terrorism.
- 6) In 1993, I was transferred to the FBI, Phoenix Division, to investigate major drug organizations and public corruption violations.
- 7) In 1995, I was assigned to the FBI, El Centro Resident Agency and investigated major drug organizations and public corruption matters. I was trained in and applied aggressive, methodical and sophisticated investigative strategies and techniques.
- 8) In 1997, I was assigned to FBI San Diego Division, to investigate Civil Rights and Domestic Terrorism cases.
- 9) In 2001, I was assigned to FBI Headquarters (FBIHQ), Washington DC, to conduct counter-terrorism and counter-intelligence investigations, and to the Office of Professional Responsibility (OPR) to conduct investigations of employee misconduct.
- 10) In 2003, I returned to FBI San Francisco Division to manage and direct a counter-intelligence squad.
- 11) In 2006, I was an FBIHQ Unit Chief assigned to the Directorate of Intelligence.

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Declaration of Michael Necochea

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2 12) In 2010, I managed and directed at FBI Los Angeles Division a Domestic
3 Terrorism Squad.

4 13) While a San Diego police officer and as an FBI investigator, I performed
5 thousands of interviews of witnesses and victims, FBI employees, and
6 confidential informants. I was trained in and acquired experience relative to the
7 review and application of FBI policies and procedures. This training included
8 but was not limited to identification and investigation of harassment,
9 intimidation, corruption, improper sexual conduct and civil rights violations.

10 14) Throughout my career as a police officer and FBI Special Agent, I provided
11 relevant testimony regarding law enforcement and counterintelligence matters
12 to tribunals and magistrates.

13
14 15) In 2012, I retired from the FBI and established MNSI. I am a licensed private
15 investigator in California, with investigative privileges in Washington State.

16
17 16) I was asked by Plaintiff's counsel to observe the January 22, 2025 Zoom
18 argument before Washington State Court of Appeals, Division I, regarding case
19 #868462. I never heard any statements, utterances or comments during the
20 argument which could be construed as a threat or harassment of any court clerk,
21 administrator, judge, or any person.

22 17) I heard some random names which did not include the last name of any person
23 or identify any person by first, middle and last name during argument.
24 Furthermore, Plaintiff's counsel referenced solely first names responsibly and
25 professionally by not including personally identifiable information such as
26

27 **Page 3**

28 **Declaration of Michael Necochea**

Marcus Gerlach, SBN 33963

579 Stetson Place

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1 middle and last names, dates of birth, social security numbers, residential or
2 place(s) of employment addresses, telephone numbers or computer E-mail
3 addresses. That portion of the argument appeared to reflect false allegations
4 against any citizen, which appeared to be protected under the Kitsap County
5 Superior Court ruling, that was challenged on appeal by the Plaintiffs.
6

7 18) If any actual, credible threat or criminal harassment was directed to a clerk,
8 administrator or judge, proper protocol, duty and professional responsibilities
9 would have required that law enforcement immediately be notified and criminal
10 investigation(s) be initiated and conducted in a timely manner to, in part, allow
11 for proper conduct of threat assessment and appropriate security measures or
12 responses to ensure safety of involved parties. I am not aware of any report to
13 law enforcement or law enforcement action at any time after the January 22,
14 2025 hearing, based on the content of plaintiffs' argument, regarding any of the
15 plaintiffs or plaintiff's counsel. In fact, I reviewed a document by Division I
16 which stated, "While Mr. Gerlach did not make a direct threat to the panel, his
17 argument implied that anyone could easily discover details about the judge's
18 adult children and target them."
19

20 19) Division I's supposition appears to lack foundation as no last names or
21 personally identifiable information were offered by Plaintiffs' counsel during
22 the argument. Division I appeared to suggest Plaintiff's counsel's comments
23 exposed previously unidentified information about referenced persons (first
24 names only) and/or judges that was not previously available. Importantly and
25 actually, Plaintiff's counsel's comments revealed no information that was not
26 previously and at the time of the January 22, 2025, hearing, accessible to the
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Page 4

Declaration of Michael Necochea

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1 public through various internet websites as public source information. While
2 the court administrator, acting on behalf of the judges, plainly admitted that no
3 threat occurred, Division I implied a threat could occur. This is neither
4 factually correct, nor a proper basis to allege Marcus Gerlach threatened any
5 judges.
6

7 20) On the contrary, based on the evidence, Marcus Gerlach could allege that
8 Division I, acting on behalf of Division I judges, deliberately acted to
9 intimidate, coerce and harass Marcus Gerlach with false claims of "serious
10 threats" unsupported by any actual facts.
11

12 21) I also reviewed Division I's reference to the National Judicial College, June
13 2024, article regarding "the United States Marshal[]'s (sic) Service reports that
14 serious threats to federal judges have doubled since 2021, a pattern also seen at
15 the state court level." This article pertained to actual threats, not harassment of
16 attorneys by Division I administrators and judges regarding oral argument
17 during a court hearing. Division I's reference to "There have been multiple
18 high-profile physical attacks on judges and their families, including homicides,
19 as well as a barrage of threats sent directly to judges or posted on social media"
20 is likewise misleading and inapplicable as no known criminal investigation was
21 initiated against Plaintiffs' counsel and no Division I judges appear to have
22 suffered any threat or harassment regarding the January 22, 2025 oral argument
23 on case # 868462. There was nothing noted in the aforementioned opening
24 argument comments which advocated or remotely suggested targeting any court
25 personnel or any person(s) in any manner.
26

27 **Page 5**

28 **Declaration of Michael Necochea**

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1 22) Based upon my education, training, experience, review of the documents and
2 evidence presented in this matter and my observation of the January 22, 2025
3 hearing, I concluded that any alleged complaint against Plaintiffs' counsel is
4 unsupported by the actual evidence and appeared to demonstrate bias by
5 Division I against Plaintiffs' counsel.
6

7 23). Division I's speculative hypothesis regarding first-named only persons during
8 the hearing also contradicted the actual basis for the argument, which was that
9 citizens who are wrongfully maligned with false statements about their
10 character should be able to pursue legal remedy in the courts and not be
11 protected based on biased judges in the trial court.
12

13
14 I, Michael Necochea, declare under the penalty of perjury, that the foregoing is true and correct.
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18 Michael Necochea
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Dated: August 28, 2025
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APPENDIX E

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10 DECLARATION OF HAROLD FRANKLIN JR.
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13 I am not a party in the above-captioned case. I am personally familiar with the facts and
14 information referenced herein. I provide this declaration based upon personal knowledge.

- 15 1) I graduated from the University of Washington School of Law and was admitted
16 to the Washington State Bar Association in 1991. I am a licensed lawyer in the
17 State of Washington.
18
19 2) I have tried numerous cases in Western Washington as my office is within the
20 jurisdiction of the Washington State Court of Appeals, Division I and I observed
21 the Zoom arguments in case # 868462 on January 22, 2025.
22
23 3) I previously personally argued cases before the Court of Appeals, Division I and
24 am familiar with the Plaintiffs and Plaintiff's counsel in case # 868462, as I
25 consulted with Plaintiff's counsel during the trial court proceedings. As an
26 attorney, I questioned many of the trial court's decisions in case # 868462.
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- 4) On January 22, 2025, I never heard any statements, utterances or comments, which could be construed as a threat or harassment of any court clerk, administrator or judge.
 - 5) I recall hearing several first names, but I could not identify any specific person based on the first name during the argument. Plaintiffs' argument appeared to suggest that the trial court's orders allowed anyone to defame another student and then seek protection under RCW 4.105. I do not believe that false allegations against any student or citizen should be protected by the Court. I understood that Plaintiffs' reference to other citizens was to merely emphasize that anyone could be defamed by false claims and then seek protection from the court, regardless of the falsity of the claim. The appeal by the Plaintiffs appeared to challenge the trial court's ruling, which protected students who defamed the Plaintiff, M.G..
 - 6) Several months after the January 22, 2025 hearing, the Court Administrator for Division I filed a document suggesting Marcus Gerlach made "serious threats" against Division I judges. Based on the January 22, 2025 oral argument, this accusation is false. A delay of 6 months for any credible threat is unconscionable.
 - 7) I have personally tried many criminal cases and am aware of criminal assault, battery and harassment. Marcus Gerlach served as co-counsel in a domestic violence case I defended. During that trial, Marcus Gerlach cross-examined law enforcement witnesses. The cross-examination revealed multiple discrepancies by law enforcement. Marcus Gerlach represented the defendant, an African-American man, pro bono.
 - 8) Based upon my education and experience as an attorney, as well as my observation of the January 22, 2025 hearing, I concluded that the Division I court's complaint against Plaintiffs' counsel alleged unsupported facts based on

1 unconfirmed evidence. Division I's claims instead appeared to demonstrate a
2 personal bias by Division I's administrator against Plaintiffs' counsel following
3 a case involving defamation by an African-American defendant.
4

5 9) Division I's speculative targeting of the judges, regarding the first-names of
6 persons during the hearing, was not supported by credible evidence. I believe
7 that Plaintiffs' counsel was articulating that anyone could be maligned with
8 false statements about their character and based on the trial court's ruling, could
9 not pursue any legal remedy because of the trial court's misreading of RCW
10 4.105.

11 10) I found it surprising that Division I's administrator complained about the exact
12 same thing that Plaintiff's counsel argued regarding false accusations against
13 students which were made public, but Division I's opinion protected the false
14 accusers over the Plaintiffs. This is one reason why the Washington State
15 Supreme Court should review the case.
16

17 11) In addition, I am particularly sensitive to bias against Plaintiffs' counsel after
18 Division I relied on inaccurate facts to substantiate their opinion by falsely
19 claiming Plaintiff was the subject of a public rally. Failing to utilize credible
20 facts in an existing case is troubling, but unfortunately not unique.

21 I, Harold Franklin Jr., declare under the penalty of perjury, that the foregoing is true and
22 correct. Dated in Renton, WA this 28th day of August, 2025.
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24 /s/Harold H. Franklin, Jr.

25 Harold H. Franklin Jr.

26 WSBA No. 20486
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APPENDIX F

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10 DECLARATION OF LESLIE WEBER
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13 I am not a party in the above-captioned case. I am personally familiar with the facts and
14 information referenced herein. I provide this declaration based upon personal knowledge.

- 15 1) I recently retired as an administrative examiner with the United States
16 Department of Labor. In that role, I was required to read legal opinions, apply
17 facts to law and reach legal conclusions. Additionally, I served as the Union
18 President and Union Steward for Union Local 2336.
- 19 2) During my employment with the United States Department of Labor, I was
20 required to represent many bargaining unit employees. I worked with Marcus
21 Gerlach in the representation of bargaining unit employees in a variety of actions
22 including Union grievances, unfair labor practices and in contract negotiations.
- 23 3) I am familiar with the Plaintiffs and Plaintiffs' counsel in case #868462, #870831
24 and #870840, as I provided litigation support to Plaintiffs' counsel during the
25 trial court proceedings. I observed many trial court's motions via Zoom and am
26 familiar with self-assigned trial court judge, Jennifer Forbes in #868462/870831.
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- 4) The same Judge Jennifer Forbes was the judge in other cases like Kitsap County Superior Court case *Bainbridge Taxpayer v City of Bainbridge Island v City of Bainbridge Island* #22-2-00875-18, a case where Judge Jennifer Forbes dismissed her old client, City of Bainbridge Island. In another case, I watched Judge Jennifer Forbes make a ruling favoring her old friend/plaintiff attorney in Kitsap County Superior Court case *Tonia Michaud v Jay Gillespie* #23-2-01382-18. Finally, I watched via Zoom, Judge Jennifer Forbes issue multiple rulings against Plaintiffs and Plaintiffs' counsel in the instant case, which appeared to contradict facts and law.
- 5) On January 22, 2025, I observed Zoom arguments regarding Judge Jennifer Forbes' Orders in *M.G. et al v BISD et al* Kitsap County Superior Court case #23-2-00048-18]. I personally observed the oral arguments in case Division I's case #868462 and never heard any statements, utterances or comments by Plaintiffs' counsel, which could be construed as a threat or harassment of any court clerk, administrator or judge. In fact, I read a declaration by a Division I administrator that admitted, "Mr. Gerlach did not make a direct threat to the panel." Despite this admission, Division I demonstrated clear bias and tainted all their decisions regarding Plaintiffs and Plaintiffs' counsel [#870831, #868462, #870840] by inaccurately claiming Plaintiffs' counsel made serious threats against the Division I panel.
- 6) During the January 22, 2025 argument, I heard several first names and believed that they were names obtained from public source information like social media accounts. I did not hear any last names. Without any last names I could not identify any specific person to the proceedings.

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7) Based on my observations, Plaintiffs' argument attempted to explain that anyone could be falsely accused of any crime and seek protection under RCW 4.105, based on Judge Jennifer Forbes' Orders. Instead of accepting Plaintiffs' argument that RCW 4.105 cannot protect false accusations, Division I falsely accused Plaintiffs' counsel of threatening the court. Division I contorted the logical analysis that false accusations are defamation, not protected by RCW 4.105, into a misleading claim that Plaintiffs' counsel seriously threatened Division I judges, which was false. Division I's inaccurate accusations twisted the compelling argument against application of RCW 4.105 and established a clear bias by Division I against Plaintiffs and Plaintiffs' counsel, based on false claims. If the opinion by Division I is not reversed, anyone can make false and heinous accusations, unsupported by any facts, and then seek protection and exorbitant legal fees under RCW 4.105. Division I's own opinion allows all children: including the children of politicians, bureaucrats, legislators, judges as well as private students like M.G., to this illegal abuse. This court should review the flawed and biased decision based on the clear reading of RCW 4.105.

8) Additionally, Division I inexplicably waited six months after the January 22, 2025 hearing to allege "serious threats" against Division I judges, presumably hoping the Washington State Supreme Court would deny review before the document was published. The failure to immediately alert authorities to the alleged "serious threat" belies the false claim of Division I claim based on malice. It appears the actions of Division I and Judge Jennifer Forbes are both similarly biased against Plaintiffs. Any court decisions based on malice must be reversed.

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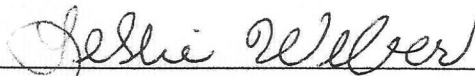
9) Further, in my opinion, upholding Judge Jennifer Forbes' Orders based on Division I's inclusion of manufactured facts to support their flawed opinion would be a travesty of justice and excuse the racial bias exhibited by one African-American defendant who made false claims about M.G. and then stated, "I dgaf [don't give a fuck] 'bout any threats of defamation suits." "Eat my black ass." Racial discrimination is a matter of serious public concern.

10) This is not the first time Plaintiffs' counsel suffered racial discrimination in the courts. I personally observed a trial in which Marcus Gerlach served as co-counsel in a domestic violence case. Marcus Gerlach provided legal defense to an accused African-American man, pro bono. Marcus Gerlach cross-examined law enforcement witnesses, revealing numerous discrepancies. During that trial, the African-American judge made disparaging comments about Marcus Gerlach without justification, resulting in a mistrial. Prejudice and bias by a Superior Court judge, District Court judge or any Appeal Court judge is completely unacceptable and unprofessional and should not be tolerated.

11) All of Division I's decisions regarding Plaintiffs and Plaintiffs' counsel are now all called into question after Division I exhibited clear bias by making erroneous claims. Division I's deliberate actions demonstrated prejudice regarding Plaintiffs and Plaintiffs' counsel involving RCW 4.105, Court Rule 11, Court Rule 12 and Court Rule 56, mandating Washington State Supreme Court review of each of Division I's opinions pertaining to Plaintiffs and Plaintiffs' counsel.

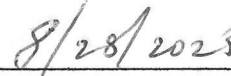
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3 12) Absent review, the Washington State Supreme Court will appear to condone
4 racial discrimination and criminal harassment against the Plaintiffs and
5 Plaintiffs' counsel in violation of state and federal laws.
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8 I, Leslie Weber, declare under the penalty of perjury, that the foregoing is true and correct.
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11 _____

12 Leslie Weber
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August 28, 2025 - 1:35 PM

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: 104,083-1
Appellate Court Case Title: Samantha Gerlach, et al. v. Bainbridge Island School District #303, et al.
Superior Court Case Number: 23-2-00048-1

The following documents have been uploaded:

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Comments:

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