

FILED
SUPREME COURT
STATE OF WASHINGTON
6/4/2025 9:15 AM
BY SARAH R. PENDLETON
CLERK

No. 1041128

IN THE SUPREME COURT
OF THE STATE OF WASHINGTON

APOLLONIA KWAN, et al.,

Respondents,

v.

ALAN B. CLARK, et al.,

Appellants.

RESPONSE OF GENERAL RECEIVER TO PETITION FOR REVIEW

s/ Stuart P. Kastner
Stuart P. Kastner, WSBA #16340
Stuart P. Kastner, PLLC
4424 Bryce Drive
Anacortes, Washington 98221
Phone: 206-300-3207
Email: spkastner@gmail.com
General Receiver

I. RESPONSE

Stuart P. Kastner, PLLC, is the General Receiver in the receivership proceeding in the Trial Court (the “Receiver”). The Receiver was not a party plaintiff or defendant in the underlying litigation giving rise to this appeal, but was joined as a party in interest.

The Receiver submits this Response to the Clark Appellants’ Petition for Review to advise the Court that it will not be filing an Answer to the Petition, and will defer to any Answer submitted by the Plaintiffs/Respondents.

*I hereby certify that this Response contains 324 words in
compliance with RAP 18.17(c)(2).*

Dated this 4th day of June 2025.

s/ Stuart P. Kastner
Stuart P. Kastner, WSBA
#16340
Stuart P. Kastner, PLLC
4424 Bryce Drive
Anacortes, Washington 98221
Phone: 206-300-3207
Email: spkastner@gmail.com
General Receiver

CERTIFICATE OF SERVICE

I, Stuart P. Kastner, hereby certify that on this day, I caused to be served true and correct copies of the foregoing document, to the following persons via the Court's electronic filing system. I caused the same to be served on the parties listed below in the manner indicated.

Scott Henrie, WSBA #12673
Scott Henrie PLLC
4145 Chuckanut Drive
Bow, Washington 98232

Email:
henrie@williamskastner.com
scott@scotthenrie.com

Phone: (206) 898-0837

Attorneys for Clark
Appellants

☒ Via Court's ECF

George S. Treperinas, WSBA #15434
Ryan Swanson Cleveland
401 Union Street, Suite 1500
Seattle, WA 98101
Phone: 206-464-4224
Email: treperinas@ryanlaw.com
Attorneys for Respondents Kwan Group

☒ Via Court's ECF

I certify under penalty of perjury that the foregoing
is true and correct.

Dated this 4th day of June 2025, at Anacortes,
Washington.

s/ Stuart P. Kastner

STUART P. KASTNER, PLLC

June 04, 2025 - 9:15 AM

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: 104,112-8
Appellate Court Case Title: Apollonia and William Kwan, et al. v. Alan B. and Lynne Clark, et al.

The following documents have been uploaded:

- 1041128_Answer_Reply_20250604091215SC259344_1384.pdf
This File Contains:
Answer/Reply - Answer to Petition for Review
The Original File Name was Answer of Receiver Petition Review 06-04-2025.pdf

A copy of the uploaded files will be sent to:

- alan@arcaau.com
- asier@karrtuttle.com
- bleaverton@cairncross.com
- dhagen@cairncross.com
- dlevitin@williamskastner.com
- foxg@ballardspahr.com
- lbrock@cairncross.com
- lynnemclark@hotmail.com
- michele@scotthenrie.com
- scott@scotthenrie.com
- treperinas@ryanlaw.com
- william.brunnquell@gmail.com

Comments:

Sender Name: Stuart Kastner - Email: spkastner@gmail.com

Address:

4424 BRYCE DR

ANACORTES, WA, 98221-3232

Phone: 206-300-3207

Note: The Filing Id is 20250604091215SC259344