

FILED
SUPREME COURT
STATE OF WASHINGTON
7/21/2025 2:04 PM
BY SARAH R. PENDLETON
CLERK

Case No: 1041209

IN THE SUPREME COURT
OF THE STATE OF WASHINGTON

Court of Appeals Division 1, Case No: 858378

NEVIN and YAVUZ DRAMAN,
Appellants

v.

LEGACY CONSTRUCTION GROUP, LLC,
Respondent

APPELLANTS' REPLY TO THE SUPREME COURT'S
MOTION TO STRIKE APPELLANTS' REPLY TO
RESPONDENT' ANSWER

Appellants
NEVIN DRAMAN (she/her) and YAVUZ DRAMAN (he/his)
are filing their own petition for review

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A. STATEMENT OF ISSUE:

On July 7, 2025, the Court received the Petitioner's

*"APPELLANTS' REPLY TO RESPONDENT'S ANSWER
IN ACCORDANCE WITH RAP 13.4."*

On July 7, 2025, the Court sent letter to the Appellants
informing them:

*The Petitioner is advised that under the RAP, a reply to
an answer to a petition for review may be filed "only if
the answering party seeks review of issues not raised in
the petition for review." RAP 13.4(d).*

*Further, "a reply to an answer should be limited to
addressing only the new issues raised in the answer."*

*RAP 13.4(d). In this case, 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.*

*Accordingly, a clerk's motion to strike the reply will be
set for consideration without oral argument by a*

*Department of the Court at the same time that the Court considers the pending petition for review. Any answer to the motion to strike the reply should be served and filed by **July 21, 2025**.*

B. ARGUMENT:

Despite **not listing them explicitly as issues** and as if not requesting the Court's review, **Respondent actually raised and discussed four new issues in Answer** that were not part of Appellants' Petition, but require the Court's review, and determination.

So, it isn't actually true that the answering party didn't seek review of issues not raised in the petition for review.

(RAP 13.4(d).) Respondent raised these issues in Answer, even fabricated one, in an effort to undermine Petition.

It is important for Appellants to present their side of the discussions on these **four new issues** and they should have the right and chance to be heard. As a result, Appellants

submitted today, on July 21, 2025 their Amended Reply to Respondent's Answer.

Appellants revised the format of their previous submitted Reply so that in Amended Reply, the Court could easily see the four new issues that Respondent raised in Answer as well as the Appellants' discussions to address them.

Appellants listed the four issues in the Amended Reply by indicating page numbers, copy pasting content from Answer, and presenting their arguments issue by issue so that the Court could easily follow and review them as addition to the issues in Petition while making a determination.

As suggested by the Court and per RAP 13.4(d) Appellants limited discussions to addressing only new issues raised in Answer and how they related to the issues that were already raised in Petition, if there is any issue like that.

Three of the four issues meet the criteria in **RAP 13.4 (b)(4)** as “*issue of substantial public interest*” so it is important for the Court to review them while making a determination.

C. CONCLUSION:

Appellants kindly request the Court not to strike Appellants’ Amended Reply to Respondent’s Answer and takes it into consideration when the Court makes a determination on the pending petition for review.

We certify that the number of words in this document is 493 and in compliance with the word limit set forth in RAP18.17.

21st day of July, 2025

21st day of July, 2025

Nevin Draman

Yavuz Draman



MINDFUL SENIOR CARE LLC

July 21, 2025 - 2:04 PM

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: 104,120-9
Appellate Court Case Title: Legacy Construction Group, LLC v. Nevin and Yavuz Draman

The following documents have been uploaded:

- 1041209_Answer_Reply_20250721140156SC634440_4235.pdf
This File Contains:
Answer/Reply - Answer to Motion
The Original File Name was Answer to Supreme Court's Motion to Strike Reply to Answer.pdf

A copy of the uploaded files will be sent to:

- clinville@linvillelawfirm.com

Comments:

Appellants' Answer to the Supreme Court's Motion to strike Appellants' Reply to Respondent's Answer

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