#### FILED

## SUPREME COURT

#### STATE OF WASHINGTON

#### 8/14/2025 8:08 AM

# BY SARAH R. PENDLETON TATE SUPREME COURT

CLERK

v. King County

1043279

Tenth Motion to Leave to Supplement Petition for Review FINAL FILING

To: Becky Woodrow, Clerk of the Court

Dear Ms. Woodrow:

Enclosed is the side-by-side comparison of the 17 Structural Voids with the Virginia Mason 1/7/2018 spine MRI. Void #15 on page 7, set 1, line 39 of the 7/7/2023 denial order — falsely states that Dr. Nwosu "stood alone." This MRI, in defendants' possession at the time, directly corroborates Dr. Nwosu and proves they withheld decisive, network-provider trauma evidence.

This omission is both a structural due process violation (manufacturing an incomplete record) and fraud on the court (deceiving the tribunal on a material fact). This undeniable proof removes any legitimate basis for the denial and should end the litigation immediately. Please send direct deposit authorization to aedinquinn@gmail.com on 8/14/2025.

Respectfully,

Dated this 14th day of August, 2025

Side-by-Side Comparison – 17 Structural Voids vs. Virginia Mason 1/7/2018 Spine MRI

| Void<br># | Structural Void Description                                     | Virginia Mason 1/7/2018 Spine MRI<br>Corroboration                      |  |
|-----------|---|---|--|
| 1         | Fatal contradiction of "sprain" theory                          | MRI timestamps structural trauma — no plausible "sprain" onset          |  |
| 2         | Current Penn Medicine treatment voids denial                    | MRI confirms chronic trauma pathology consistent with ongoing treatment |  |
| 3         | Augmented surgery confirms collapse                             | MRI supports surgical necessity (fusions, cage, laminectomy)            |  |
| 4         | Constitutional void triggered by continued treatment & collapse | MRI shows severe pathology existing long before denial                  |  |
| 5         | Relief required by medical reality & lack of rebuttal           | MRI corroborates unrebutted expert opinion                              |  |
| 6         | Silent burden shift without notice                              | MRI in file at time of shift proves claimant met burden                 |  |

| Void<br># | Structural Void Description   | Virginia Mason 1/7/2018 Spine MRI<br>Corroboration   |
|-----------|---|--|
| 7         | No rebuttal to Dr. Nwosu's testimony  | MRI supports Dr. Nwosu, no competing medical report exists   |
| 8         | Denial issued despite trauma-confirming MRIs  | MRI is direct trauma evidence  |
| 9         | Denial issued without completing evidentiary record   | MRI was omitted from record despite availability   |
| 10        | Appellant muted during critical hearing   | MRI evidence unavailable for oral defense  |
| 11        | Sprain theory unsupported by any diagnostic or expert evidence  | MRI refutes "sprain" diagnosis   |
| 12        | Barred from confirming whether defense<br>reviewed trauma records   | MRI confirms defense could not refute trauma   |
| 13        | Penn Medicine causation link excluded   | MRI shows trauma consistent with hip-<br>spine causation link  |
| 14        | Exclusion of relevant MRI from appellate review   | MRI withheld from appellate record   |
| 15        | On page 7, line 39 of the 7/7/2023 denial order, the court falsely states Dr. Nwosu "stood alone." This ignored the Virginia Mason 1/7/2018 spine MRI in defendants' possession, which directly corroborates Dr. Nwosu's causation opinion. | MRI shows trauma-anchored pathology aligning with Dr. Nwosu's testimony. Withholding it is both a structural due process violation and fraud on the court because it deceived the tribunal on a material fact. |
| 16        | Failure to reconcile Virginia Mason findings with denial rationale  | MRI disproves denial's factual premise   |
| 17        | Continued withholding of benefits despite conclusive proof  | MRI provides conclusive proof justifying immediate reinstatement   |
| Date      | d 8/14/2025   |  |
| Aedi      | n Quinn   | Aedin Quinn  |

1054 Glenwood Avenue SE

aedinquinn@gmail.com

Atlanta, Ga 30316 404 992 1235

## CERTIFICATE OF SERVICE

I certify that on August 14, 2025, I served a copy of this FINAL FILING TENTH MOTION TO LEAVE TO SUPPLEMENT PETITION FOR REVIEW side by side comparison on the following party by email and U.S. Mail:

Tylar Edwards
King County Prosecuting Attorney's Office
500 Fourth Avenue, Suite 900
Seattle, WA 98104
Email: tylar.edwards/a kingcounty.gov

Aedin Quinn 1054 Glenwood Avenue SE Atlanta, GA 30316 Phone: 404-992-1235

aedinquinn@gmai.com

Signature:

Exhibit 8K

## Document info

Result type:

MRI Lumbar Spine

Result date:

Jan 07, 2018, 10:48 a.m.

Result status:

authenticated

Verified by

Kathleen Fink

Modified by:

Kathleen Fink

Accession number:

9402735

Patient:

AEDIN QUINN

DOB:

May 01, 1963

EXAMINATION: MRI of the lumbar spine without contrast. 1/7/2018

COMPARISON: None.

Clinical statement: Exam Reason:low back pain, h/o disc injury, eval for tear/herniation EBM:Lumbar 8 mL gadavist, 0 discarded from a multi dose vial.

TECHNIQUE: Sagittal T1, sagittal T2, sagittal STIR, axial T1 and axial T2 weighted images of the lumbar spine were obtained. No IV contrast.

Findings:

Alignment: Normal.

Marrow: No evidence of marrow infiltrative process. No compression fracture. Modic type II endplate degenerative changes at L5-S1

Disks: Disc desiccation with disc height loss at L5-S1. Findings indicate disc degeneration.

Conus: Normal in appearance. Terminates at L1.

Paraspinous/retroperitoneal regions: Visualized portions unremarkable. Normal appearance of anterior and posterior longitudinal ligaments. No edema in the paravertebral soft tissues and no edema in the interspinous ligaments.

Lumbar spine degenerative changes:

## **AEDIN QUINN - FILING PRO SE**

## August 14, 2025 - 8:08 AM

## Filing Petition for Review

## **Transmittal Information**

**Filed with Court:** Supreme Court **Appellate Court Case Number:** Case Initiation

**Appellate Court Case Title:** Aedin Quinn, Appellant v. King County, Respondent (863894)

## The following documents have been uploaded:

PRV\_Petition\_for\_Review\_20250814080736SC074062\_3217.pdf

This File Contains: Petition for Review

The Original File Name was Signed 17 Structural Voids Side By Side Comparison.pdf

## A copy of the uploaded files will be sent to:

- aedinquinn@gmail.com
- anastasia.sandstrom@atg.wa.gov
- tylar.edwards@kingcounty.gov

#### **Comments:**

Sender Name: Aedin Quinn - Email: aedinquinn@gmail.com

Address:

1054 Glenwood Avenue SE

Atlanta, GA, 30316 Phone: (206) 849-6321

Note: The Filing Id is 20250814080736SC074062