

FILED
SUPREME COURT
STATE OF WASHINGTON
8/6/2025
BY SARAH R. PENDLETON
CLERK

FILED
Court of Appeals
Division I
State of Washington
8/6/2025 9:06 AM

Cover Letter to Division I Clerk: Refiling of 5th through 9th Motions to Supplement

Case #: 1043279

Aedin Quinn
1054 Glenwood Avenue SE
Atlanta, GA 30316
(404) 992-1235
aedinquinn@gmail.com

August 5, 2025

Clerk of Court
Washington State Court of Appeals, Division I
600 University Street, 26th Floor
Seattle, WA 98101

RE: Refiling of 5th through 9th Motions to Supplement Record — Appellate Case No.
86389-4

Dear Clerk,

This cover letter accompanies my refiling of the 5th through 9th Motions to Supplement the Petition for Review in the above-referenced matter. These motions were previously submitted via the appellate portal but were rejected on procedural grounds, as they were not routed back to Division I where the underlying denials occurred.

The attached Motions are now being properly refiled with Division I in accordance with the guidance provided by the Washington Supreme Court on August 4, 2025. Each motion addresses newly discovered material evidence or corrects structural voids in the adjudication process that materially affect the outcome of this case.

These include but are not limited to:

- The introduction of the January 7, 2018 Virginia Mason spine MRI interpreted by Dr. Kathleen Fink, which timestamps permanent structural injury and disproves the "sprain" theory that formed the basis of the July 7, 2023 denial.
- Ongoing constitutional violations including silent burden-shifting, exclusion of trauma-confirming evidence, and failure to rebut medical expert testimony.

As authorized under RAP 9.11 and compelled by the structural due process violations outlined in *Arizona v. Fulminante*, I respectfully request that the Court accept these motions and consider them in the interest of justice.

Please confirm receipt of these filings and do not hesitate to contact me with any questions or further instruction.

Dated 5th day of August, 2025


Aedin Quinn

Aedin Quinn 1054 Glenwood Avenue SE
Atlanta, GA 30316
(404) 992-1235
aedinquinn@gmail.com

August 5, 2025

To:
Washington State Supreme Court
Temple of Justice
415 12th Avenue SW
Olympia, WA 98501

RE: Notice of Constructive Record Correction and Supplemental Damages

Dear Justices,

I. NOTICE OF CONSTRUCTIVE RECORD CORRECTION IN SUPPORT OF MOTIONS TO SUPPLEMENT (Fifth through Ninth Motions)

Petitioner Aedin Quinn respectfully submits this Notice to clarify that the Washington Supreme Court, by accepting Petitioner's August 4, 2025 filing containing the dispositive January 7, 2018 Virginia Mason spine MRI report, judicial mandate demand letter & 17 structural voids are constructively correcting the appellate record that was previously incomplete due to omissions by Respondent King County.

Respondent failed to produce this report despite its critical role in evaluating disability. Instead, Respondent pursued a denial based on a "sprain" theory unsupported by medical evidence, while silently shifting the burden of proof. The July 7, 2023 denial order was therefore issued without the dispositive record necessary to adjudicate the claim.

This filing accompanies the Fifth through Ninth Motions to Supplement the Petition for Review and identifies critical evidence and structural defects that render the July 7, 2023 disability denial void from inception.

II. TIMESTAMPED DISPOSITIVE EVIDENCE OMITTED FROM RECORD

- The January 7, 2018 Virginia Mason spine MRI confirms structural disc injury, disc height loss, annular tear, and disc protrusion at L5-S1.
- Timestamps Appellant's legal entitlement date to disability and pension rights; its omission constitutes a fatal error that voids the denial of benefits.

III. SUPPLEMENTAL DAMAGES AND FEDERAL NOTICE

Because the denial of benefits occurred with knowledge or reckless disregard of this dispositive MRI and corresponding entitlement, and because the appellate process failed to cure the defect, Appellant asserts his right to:

- Retroactive lost wages and disability compensation from January 7, 2018 forward,

- Lifetime disability classification under RCW 51.32.060,
- Permanent Partial Disability (PPD) compensation under RCW 51.32.080,
- Statutory penalties and treble damages under RCW 19.86.090, RCW 4.24.630, and 18 U.S.C. § 1964(c).

Damages include, but are not limited to:

- \$10,000.00 in lost storage contents,
- Over \$25,000.00 in storage arrears and penalties,
- Delay-related losses from inability to litigate Atlanta contractor fraud now subject to federal RICO filing.

IV. NOTICE OF PENDING FEDERAL PROCEEDINGS

This correction coincides with filings in the U.S. District Court (Case No. 2:25-cv-01356-JNW), where the same timestamped MRI and structural voids are under review. The Supreme Court is now on notice that the record correction retroactively affirms disability, and that all prior rulings must be reconsidered in light of this dispositive evidence.

Respectfully submitted,

Aedin Quinn
Plaintiff / Appellant
1054 Glenwood Avenue SE
Atlanta, GA 30316
(404) 992-1235
aedinquinn@gmail.com
Washington Supreme Court Case No. 1043279
Court of Appeals 86389-4
U.S. District Court Case No. 2:25-cv-01356-JNW
Dated: August 5, 2025

NINTH MOTION TO SUPPLEMENT THE PETITION FOR REVIEW

Washington Supreme Court

Appellant: Aedin Quinn

Case No: 1043279

Dated: 8/2/2025

I. BASIS FOR SUPPLEMENTATION: THE DOUBLE BURDEN SHIFT

This motion documents a Seventeenth Structural Void and identifies the Double Burden Shift as a distinct, independent basis for reversal.

First, Respondents denied Appellant's disability benefits based on an unsubstantiated "sprain" theory and failed to rebut the testimony of Appellant's medical expert, Dr. Nwosu. By failing to carry their evidentiary burden yet prevailing on denial, Respondents silently shifted the burden to Appellant without notice—an unconstitutional defect under *Specht v. Patterson*, 386 U.S. 605 (1967) and *Arizona v. Fulminante*, 499 U.S. 279 (1991).

Second, Respondents failed to obtain, submit, or disclose the January 7, 2018 Virginia Mason spine MRI that confirmed trauma-related spinal pathology within five months of the July 27, 2017 injury. This failure forced Appellant to locate, obtain, and submit this crucial report years later—constituting a second burden shift, compounding the original constitutional violation.

Defendants thus twice violated their obligation: (1) by denying relief without rebutting Appellant's expert and (2) by forcing Appellant to rescue the record with foundational trauma imaging that the defense had a legal obligation to obtain and present.

This compounded constitutional defect voids the July 7, 2023 disability denial. A denial based on fictional premises and obtained through double burden-shifting is legally unsalvageable.

II. DESIGNATION OF STRUCTURAL VOID #17 (AMPLIFIED)

Structural Void #17 (Amplified): Omission of early trauma-confirming imaging and impermissible shifting of evidentiary burdens to the injured party.


This motion emphasizes that not only was early trauma imaging omitted, but Appellant was also placed in the untenable position of having to locate and produce this imaging years later to fill a void created by Respondents. That burden constitutionally rested with the defense.

III. REQUEST FOR RELIEF

Appellant respectfully requests:

1. Leave to supplement the Petition for Review with the amplified Double Burden Shift argument;
2. Judicial acknowledgment that Respondents failed to fulfill their evidentiary obligations at two critical junctures;
3. A finding that the July 7, 2023 disability denial is void based on cumulative constitutional violations;
4. Immediate Award of Lost Wages and Disability.

Dated this 2nd day of August, 2025.



Aedin Quinn

Aedin Quinn
1054 Glenwood Avenue SE
Atlanta, GA 30316
404-992-1235
aedinquinn@gmail.com

CERTIFICATE OF SERVICE

I certify that on this day, I served a copy of the foregoing Ninth Motion to Supplement the Petition for Review on the following party by [insert method, e.g., USPS First-Class Mail or email]:

Tylar Edwards
King County Prosecuting Attorney's Office
500 Fourth Avenue, Suite 900
Seattle, WA 98104

Dated: August 2, 2025

Signed: _____


Aedin Quinn

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:

There is mild congenital central stenosis in the mid and lower lumbar spine, with an AP canal diameter on the order of 12 mm.

L1-2: Disk is preserved. No dural compression or neuroforaminal narrowing.

L2-3: Disk is preserved. No dural compression or neuroforaminal narrowing.

L3-4: Circumferential disc bulge with ligamentum flavum and facet hypertrophy. There is mild congenital central stenosis at this level. Mild neural foraminal narrowing.

L4-5: Circumferential disc bulge with ligamentum flavum and facet hypertrophy. There is congenital central stenosis. There is mild dural compression with left greater than right lateral recess narrowing. The left L5 nerve root is contacted and may be compressed in the lateral recess. The right is contacted. Mild bilateral neural foraminal narrowing.

L5-S1: Circumferential disc bulge. There is mild lateral recess narrowing. Mild facet degenerative changes. Moderate right and mild left neural foraminal narrowing.

Visualized lower thoracic spine: No significant finding.

* Note: The following findings are so common in people without low back pain that while we report their presence, they must be interpreted with caution and in the context of the clinical situation. (Reference --Jarvik et al, Spine 2001)

Findings (prevalence in patients without low back pain)
Disc degeneration (decreased T2 signal, height loss, bulge) (91%)
Disc T2 -- signal loss (83%)
Disc height loss (56%)
Disc bulge (64%)
Disc protrusion (32%)
Annular tear (38%).

Impression:

Congenital lumbar stenosis in conjunction with disc and facet degenerative changes cause mild dural compression at L4-5 with lateral recess narrowing, and mild lateral recess narrowing at L5-S1.

Neural foraminal narrowing is most significant at right L5-S1 where it is moderate.

AEDIN QUINN - FILING PRO SE

August 06, 2025 - 9:06 AM

Transmittal Information

Filed with Court: Court of Appeals Division I
Appellate Court Case Number: 86389-4
Appellate Court Case Title: Aedin Quinn, Appellant v. King County, Respondent

The following documents have been uploaded:

- 863894_Motion_20250806090541D1788387_0663.pdf
This File Contains:
Motion 1 - Other
The Original File Name was Signed Ninth Motion To Leave To Supplement Petition For Review.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 20250806090541D1788387