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

FILED Court of Appeals Division I State of Washington 8/5/2025 3:58 PM

Case #: 1043279

Cover Letter to Division 1 Clerk: Kettling of 5th through 9th Motions to Supplement

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

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

Aedin Quinn, Appellant

V.

No. 1043279

King County, Respondent

COMBINED FIFTH MOTION TO SUPPLEMENT, LEGAL MEMORANDUM SUPPORTING REVERSAL & DESIGNATION OF SIXTEENTH STRUCTURAL VOID

Appellant respectfully moves this Court for leave to supplement the Petition for Review based on newly clarified due process violations and trauma-confirming medical records from Virginia Mason, Grady, and Penn Medicine. These findings void the July 7, 2023 denial of disability and compel reversal under *Arizona v. Fulminante*, 499 U.S. 279 (1991).

I. GROUNDS FOR SUPPLEMENTATION

Introduction of "Sprain" Theory Post-Record Closure
 Appellant was denied the opportunity to rebut the "sprain" theory, which was never
 introduced while the evidentiary record remained open. The denial of benefits based
 on this untested theory constitutes a textbook due process violation. No rebuttal
 testimony or medical report was provided to contest the trauma-linked MRI
 evidence.

Virginia Mason MRI January 7, 2018 Kathleen Fink Spine MRI Report

The 1/7/2018 MRI documented disc bulging, ligamentum flavum thickening, facet hypertrophy, dural compression, and contact with both L5 nerve roots. These findings mirror the Grady (2020) and Penn Medicine (2025) MRIs and undermine the plausibility of the "sprain" narrative. These structural abnormalities are medically incompatible with a diagnosis of "lumbar strain" or "sprain," as they represent post-traumatic degeneration, not transient soft tissue injury. The Virginia Mason imaging confirms that the spine had already begun to structurally deteriorate in the aftermath of the transit trauma, precluding any reasonable conclusion that the injury was merely a soft-tissue sprain.

Structural Parallels Across Medical Institutions
 The repeated documentation of ligamentum flavum thickening, radiculopathy, facet arthropathy, and nerve root contact across three unaffiliated institutions confirms the diagnosis of a progressive trauma-linked spinal injury.

II. LEGAL BASIS

The Washington Supreme Court has inherent authority to accept supplemental submissions when constitutional violations are alleged, particularly when those violations render the judgment void. See *Arizona v. Fulminante*, 499 U.S. 279 (1991) (structural errors not subject to harmless error review).

I. GROUNDS FOR SUPPLEMENTATION

Introduction of "Sprain" Theory Post-Record Closure
 Appellant was denied the opportunity to rebut the "sprain" theory, which was never
 introduced while the evidentiary record remained open. The denial of benefits based
 on this untested theory constitutes a textbook due process violation. No rebuttal
 testimony or medical report was provided to contest the trauma-linked MRI
 evidence.

2. Virginia Mason January 7, 2018 MRI

The January 1, 2018 performed approximately five months after the July 27, 2017 injury, documented disc bulging, ligamentum flavum thickening, facet hypertrophy, dural compression, and contact with both L5 nerve roots. These findings mirror the Grady (2020) and Penn Medicine (2025) MRIs and undermine the plausibility of the "sprain" narrative. These structural abnormalities are medically incompatible with a diagnosis of "lumbar strain" or "sprain," as they represent post-traumatic degeneration, not transient soft tissue injury. The Virginia Mason imaging confirms that the spine had already begun to structurally deteriorate in the aftermath of the transit trauma, precluding any reasonable conclusion that the injury was merely a soft-tissue sprain.

3. Structural Parallels Across Medical Institutions
The repeated documentation of ligamentum flavum thickening, radiculopathy, facet
arthropathy, and nerve root contact across three unaffiliated institutions confirms the
diagnosis of a progressive trauma-linked spinal injury. This convergence of
terminology and radiographic abnormalities evidences the continuity and
consistency of the trauma origin and reinforces that the "sprain" narrative is
medically implausible.

II. SUPPLEMENTAL LEGAL MEMORANDUM: AUTOMATIC REVERSAL TRIGGERED BY SUPPLEMENTAL EVIDENCE

- 1. Constitutional Structural Error
- The denial was issued without any rebuttal of Appellant's trauma-based diagnosis.
- The "sprain" theory was introduced post hoc and never litigated in open record.
- Appellant was denied fair notice, the right to rebut, and the right to a complete record.
- Structural errors of this nature are not subject to harmless error analysis (Fulminante).

2. Material Medical Supplementation

 The January 7, 2018 Virginia Mason MRI independently confirms progressive trauma-linked injury (disc bulge, ligamentum flavum thickening, dural compression, L5 nerve root contact).

- These findings mirror Grady (2020) and Penn Medicine (2025), proving institutional consistency.
- Such anatomical damage cannot legally or medically be classified as a "sprain."

BACKGROUND AND BASIS FOR SUPPLEMENT

This Motion incorporates Virginia Mason 1/7/2018 spine MRI report, which wasn't included to directly rebut the post hoc "sprain" theory that appeared only after the evidentiary record closed, without notice or rebuttal opportunity.

The Court's July 7, 2023 denial rested on the theory that Appellant suffered from a mere "sprain"—a claim never introduced or rebutted in the adversarial process. This theory was adopted in silence, in absence of a rebuttal expert report, and in conflict with trauma-anchored imaging already in the record. The new exhibit further confirms the post-traumatic nature of Appellant's spinal injury.

SIXTEENTH STRUCTURAL VOID

Caption: "Denial Based on Post-Record 'Sprain' Theory Without Adversarial Rebuttal"

This Sixteenth Structural Void establishes the following:

- The denial was based on a factual theory ("sprain") that was never raised or litigated while the evidentiary record was open;
- Appellant was denied a meaningful opportunity to rebut the theory through expert response or evidentiary challenge;
- The Virginia Mason 1/2018 spine MRI disproves the possibility of a soft-tissue strain
 as the cause of the injury, identifying structural changes including disc bulging,
 ligamentum flavum thickening, and L5 nerve root contact;
- The court silently adopted the post hoc "sprain" rationale after the record closed, denying Appellant notice, participation, and rebuttal.

Constitutional Grounds: This constitutes structural error under *Arizona v. Fulminante*, as it denies due process at the foundation of the adjudicative process. No harmless error doctrine applies. The disability denial is void by law.

This designation is now formally integrated into Appellant's filings as the Sixteenth Structural Void.

III. CONCLUSION

For the foregoing reasons, Appellant respectfully requests this Court grant leave to supplement the Petition for Review with the attached due process argument and medical corroboration disproving the "sprain" rationale used to deny disability and immediately reverse the July 7, 2023 denial of disability benefits based on constitutional grounds. Relief is constitutionally mandated where denial rests on unrebutted injury and a theory advanced only after closure of the record.

3. Relief Requested

- Appellant has demonstrated that the 7/7/2023 denial rests on a fictional rationale disproven by radiographic evidence.
- The Washington Supreme Court is mandated to reverse the denial and restore disability rights retroactive to 7/7/2023.
- 3. GRANT this Fifth Motion to Supplement the Petition for Review;
- 4. ACCEPT the Virginia Mason 1/7/2018 MRI report as a supplemental exhibit;
- RECOGNIZE this issue as the Sixteenth Structural Void confirming automatic reversal;
- 6. REVERSE the July 7, 2023 disability denial without further delay Aedin Quinn

Dated this 31st day of July, 2025.

Aedin Quinn

Aedin Quinn 1054 Glenwood Avenue SE Atlanta, GA 30316 (404) 992-1235 aedinquinn@gmail.com Dated: July 31, 2025

CERTIFICATE OF SERVICE

I certify that on July 31, 2025, I served a copy of this Emergency Motion for Summary Relief on the following party by email and U.S. Mail:

Tylar Edwards 500 Fourth Avenue, Suite 900 Seattle, WA 98104

Email: tylar.edwards@kingcounty.gov

Signature:

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

Document info

Result type:

MRI Lumbar Spine

Result date:

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

Result status:

authenticated

Verified by:

Modified by:

Kathleen Fink 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.

ABOUT YOU What is your current weight: 17 lbs.; and height, 5 Ft. 10 In.. Please describe your condition: Signature: Date:

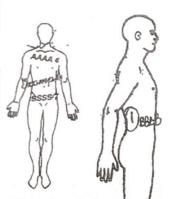
Please mark area(s) of injury or discomfort as shown in the example below. Mark all areas with the appropriate symbols and indicate the degree of pain using a scale from 1 (discomfort) to 10 (extreme pain).

Description Numbress Pins & Needles PPPP Symbol ----NNNN

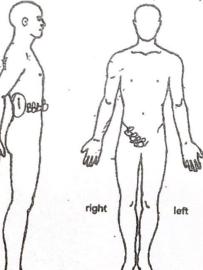
Burning

Stabbing

BBBB Circle any area of pain not represented by a symbol.



Example



Right

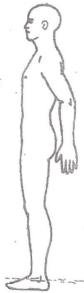


Front

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Back



Left

PLEASE RECYCLE SO THAT I'VE MAY PRESERVE THE HEALTH OF OUR PLANET

First Impression Forms, Inc. 1-800-99FORMS FORM # 2CHIRO.3 © 1998

UW-Medicine eCare - Letters

https://ecare.uwmedicine.org/mychartprod01/inside.asp?mode=letter..

Name: Drey Quinn | DOB: 5/1/1963 | MRN: U6168379 | PCP: Corinne S Heinen, MD

Letter Details

UW Medicine

UW NEIGHBORHOOD CLINICS

BELLTOWN CLINIC

January 18, 2018

RE: Aedin Quinn DQB: 5/1/1963 Labor & Industry # 37681

To Whom It May Concern:

Aedin saw me for the injury above on 10/26/17, at which time I instructed him to be off work from that day until 11/27/17.

Sincerely,

Corinne S Heinen, MD

UW NEIGHBORHOOD CLINICS BELLTOWN FAMILY MEDICINE

2505 Second Ave, Suite 200 Seattle, WA 98121-1495 208-443-0400 Fax 208-520-1599

This letter was initially viewed by Aedin Quinn at 1/18/2018 7:56 PM.

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aedin quinn <aedinquinn@gmail.com>

Case Number: 2018-5007

8 messages

aedin quinn <aedinquinn@gmail.com> To: medical.reconsiderations@doh.wa.gov Wed, May 9, 2018 at 6:24 PM

To Whom It May Concern: Dr. Curtis returned me to work to be subjected to 100,000 lbs of constant whole body vibration citing "non objective findings." Dr. Curtis 1/12/2018 did not incorporate Kathleen Fink's "Objective Findings" MRI 1/7/2018 report that state "L-4 compressed nerves & nerve in contact". On 2/22/2018 I went to Dr. Richard Haynes complaining of "burning sensation at right oblique & right groin", on or about 3/1/2018 I discovered Kathleen Fink's MRI report which explained the burning sensation I reported on 2/22/2018.

Again, Dr. Curtis elevated his voice to prevent me from asking MRI questions, refused to answer my questions during during two post MRI meetings and made false statements on his discharge summary report stating mutual Return To Work Strategy, Presently my lumbar spine aches constantly & I feel swiping contact on the right side of my lower back as if it is that "nerve in contact" per Fink's report,

Please leave my complaint open until spine surgeon appointment/examination,

Aedin Quinn

DOH MQAC Requests for Reconsideration Medical.Reconsiderations@doh.wa.gov> To: aedin quinn <aedinquinn@gmail.com>

Thu, May 10, 2018 at 1:24 PM

Ms. Quinn,

As stated in the complaint closure notification letter sent to you by email on 4/19/2018, the law allows you one opportunity to request reconsideration. To do so, you must provide new information about your original complaint within 30 days of receiving your letter. At this time your complaint is closed. If you wish to request reconsideration of closed complaint #2018-5007, please be sure to submit new information not already considered by the Commission no later than 05/19/2018. This is the only review option provided by statute following complaint closure and we are not authorized to grant extensions to the 30 day timeframe outlined in statute, RCW 18.130.057(5)(a).

Thank you.



WMC Contracts and Reconsiderations

Washington Medical Commission



[Quoted text hidden]

Exhibit 57A

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AEDIN QUINN - FILING PRO SE

August 05, 2025 - 3:58 PM

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_20250805155704D1034962_6524.pdf

This File Contains: Motion 1 - Other

The Original File Name was Signed Fifth Motion To Leave To Supplement Petition For Review.pdf

A copy of the uploaded files will be sent to:

• aedinquinn@gmail.com

 $\bullet \ \ an astasia. s and strom@atg.wa.gov$

• 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 20250805155704D1034962