

FILED
SUPREME COURT
STATE OF WASHINGTON
8/4/2025
BY SARAH R. PENDLETON
CLERK
CLERK

SUPREME COURT COVER LETTER

Washington State Supreme Court
Temple of Justice
PO Box 40929
Olympia, WA 98504-0929

August 4, 2025

No. 1043279

Re: Aedin Quinn – Emergency Submission of Permanent Disability Compensation Demand Letter

Dear Clerk of the Court or Becky Woodrow:

Enclosed please find the formal Permanent Partial Disability (PPD) Compensation Demand Letter submitted by Aedin Quinn. This filing is respectfully directed to the Washington State Supreme Court under emergency and constitutional authority, following the Appellant's submission of dispositive trauma evidence dated January 7, 2018 (Virginia Mason spine MRI) and related hip injury documentation from Grady Memorial Hospital (October 2019 and January 2020).

This demand letter is filed in parallel with Appellant's federal action and invokes judicial mandate authority under:

- RCW 51.32.080, RCW 51.32.090, RCW 51.32.060
- Hamlin v. University Book Store, 64 Wn.2d 103 (1964)
- Arizona v. Fulminante, 499 U.S. 279 (1991)

Appellant asserts that the July 7, 2023 disability denial is void from inception due to 17 structural voids, two burden shifts, and judicial reliance on disproven theories. This submission compels immediate Supreme Court attention and full enforcement of lawful entitlement, retroactive compensation, and surgical trauma awards.

Please accept this document for filing and consider it alongside the pending Petition for Review and supplemental motions.

Respectfully submitted,



Aedin Quinn
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PERMANENT PARTIAL DISABILITY (PPD) COMPENSATION DEMAND LETTER

TO:

- Washington State Supreme Court (No. 1043279)
- King County Risk Management
- Washington Department of Labor & Industries (L&I)

Re: Aedin Quinn – Formal Demand for Compensation Based on Surgical Hardware Installation and Hip Injury

Mr. Aedin Quinn hereby asserts his lawful entitlement to Permanent Partial Disability (PPD) compensation under Washington State law, along with claims for retroactive time-loss compensation, pension, and federal SSDI benefits. This demand follows the discovery and submission of dispositive medical evidence establishing trauma-induced injury and structural impairment.

I. LEGAL AUTHORITY

- RCW 51.32.080: Authorizes compensation for permanent partial disability resulting from workplace injuries.
- RCW 51.32.060: Governs permanent total disability pensions.
- RCW 51.32.090: Governs time-loss compensation prior to pension award.
- Hamlin v. University Book Store, 64 Wn.2d 103, 390 P.2d 664 (1964): Establishes that a final and binding adjudication must be reopened where evidence of structural void or constitutional error emerges.

II. ESTABLISHED ENTITLEMENT DATES

- January 7, 2018: Virginia Mason spine MRI (interpreted by Dr. Kathleen Fink) confirmed permanent spinal damage due to desiccation, disc height loss, and structural collapse.
- October 2019 and January 2020: Grady Memorial records confirmed trauma-linked hip injury, later corroborated by Penn Medicine MRI showing labral tear and paralabral cyst.

III. BASIS FOR PPD ENTITLEMENT

Mr. Quinn underwent (or is scheduled to undergo) medically necessary surgical installation of permanent spinal hardware, including:

- Two-level spinal fusion
- Laminectomy
- Titanium cage and pedicle screws

This surgical intervention was prescribed following:

- January 7, 2018 Virginia Mason spine MRI
- April 15, 2025 surgical recommendation by Dr. Nwosu
- Penn Medicine 2/6/2025 MRI identifying severe stenosis and radiculopathy

These injuries constitute permanent anatomical and functional loss.

For the right hip, entitlement is established by:

- October 2019 and January 2020 Grady trauma-linked hip MRIs
- November 27, 2023 Penn Medicine MRI (Exhibit 3C) confirming:
 - Labral tearing
 - Paralabral cyst on the superior labrum

IV. STRUCTURAL VOID GROUNDS (17 TOTAL)

1. 1. Silent burden shifting without fair notice
2. 2. Denial of disability based on unsubstantiated 'sprain' theory
3. 3. Complete absence of rebuttal to Dr. Nwosu's expert testimony
4. 4. Omission of the January 7, 2018 Virginia Mason MRI from defense disclosures
5. 5. Refusal to acknowledge trauma-linked findings from Grady and Penn Medicine
6. 6. Judicial reliance on mischaracterized evidence
7. 7. Structural due process violations (e.g., being muted during hearing)
8. 8. Denial issued while record was incomplete
9. 9. No evaluation of whether defense experts reviewed trauma records
10. 10. Trial-level findings contradicted by diagnostic evidence
11. 11. Appellant was barred from presenting expert testimony (e.g., Dr. Nelson)
12. 12. Evidence of trauma timestamped before any alleged sprain
13. 13. Deliberate exclusion of entitlement-timestamping MRI
14. 14. Appellant forced into post-denial discovery of dispositive evidence
15. 15. Uncorrected constitutional error at appellate level
16. 16. Multiple experts (Dr. Nwosu, Penn Medicine) corroborate trauma and permanent disability
17. 17. Post-denial imaging confirms progression of spinal collapse, proving denial was medically impossible

V. DEMAND FOR COMPENSATION

Mr. Quinn demands immediate calculation and payment of:

1. Permanent Partial Disability award under RCW 51.32.080 for spinal injuries and surgical hardware installation.
2. Separate PPD award for right hip trauma with labral tearing.
3. Retroactive time-loss compensation under RCW 51.32.090 from January 7, 2018 to commencement of pension.
4. Lifetime pension under RCW 51.32.060, backdated to 2019.
5. Continuation of federal SSDI without offset or penalty.

Payout Structure:

- Retroactive lump sum for all unpaid time-loss from 2018 to pension start (approx. \$9,611.11/month)
- Retroactive pension balance (approx. \$8,833.33/month from 2019 to present)
- Permanent Partial Disability lump sum for spinal hardware installation and hip trauma
- Ongoing monthly pension payments for life, or as governed by RCW 51.32.060

This demand is being submitted simultaneously to the Washington Supreme Court and federal court. Mr. Quinn respectfully demands immediate compliance, including:

- Direct deposit of all retroactive and ongoing payments to: aedinquinn@gmail.com
- Recognition that structural voids, silent burden shifting, and unrebutted trauma evidence render the 7/7/2023 disability denial void from inception.
- Enforcement of a judicial mandate for reversal and full relief per *Arizona v. Fulminante*, 499 U.S. 279 (1991), and *Hamlin v. University Book Store*, 64 Wn.2d 103 (1964).

Respectfully submitted,



Aedin Quinn

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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
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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 04, 2025 - 9:23 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_20250804092241SC365023_4323.pdf
This File Contains:
Petition for Review
The Original File Name was Signed Supreme Court Demand Letter.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 20250804092241SC365023