

CLERK

STATE COURT OF THE STATE OF WASHINGTON

Supreme Court No. 1043279 Court Of Appeals 863894 Superior Court No. 23-2-23850-8

AEDIN QUINN,  
Petitioner,

v.

KING COUNTY,  
Respondent,

### MOTION FOR JUDICIAL NOTICE OF JURISDICTIONAL DEFECT

#### I. RELIEF REQUESTED

Petitioner respectfully moves this Court to take judicial notice of a jurisdictional defect arising from King County's failure to perform the statutory Job Analysis required by RCW 51.32.099 and RCW 51.36.010(2)(a). Because the statutory process collapsed, pension entitlement vested by operation of law on July 15, 2019, and all subsequent proceedings, including the July 7, 2023 denial, are void ab initio.

#### II. BASIS FOR MOTION

1. Medical Separation Triggers. On March 3, 2019, King County's KC-2 form acknowledged on page 1(A): "Disability physical or mental impairment that substantially limits the employee's ability to perform his job," and further stated on page 3(E): "An employee who receives a Medical Separation due to a disability that prevents him from performing one or more essential functions of his job is eligible for the Reassignment Program." These are binding admissions by King County that Petitioner could not perform essential job functions.

2. Statutory Requirement for Job Analysis. Under RCW 51.32.099 and RCW 51.36.010(2)(a), once such admissions are made, the employer is required to prepare and transmit a completed Job Analysis to the attending provider, here Dr. June Cooley, for review and signature. No such Job Analysis was ever performed or transmitted.

3. Role of Dr. Cooley. Petitioner's attending provider, Dr. June Cooley, is a expert witness of the highest caliber forensic psychologist who testifies globally, including in death-sentence cases. Dr. Cooley has the authority to confirm that no completed Job Analysis was ever performed or transmitted to her for review. Her confirmation is indispensable to establishing that the statutory predicate under RCW 51.32.099 and RCW 51.36.010(2)(a) was never met. Because the statutory Job Analysis requirement was never performed, and this statutory defect was suppressed, Petitioner's pension was unlawfully converted and withheld despite Medical Separation triggers (MS-1, MS-3, and KC-2) that had already vested entitlement as of July 15, 2019.

4. Jurisdictional Consequence. Because the Job Analysis requirement was never satisfied, the statutory bridge to employability collapsed. Pension entitlement therefore vested as of July 15, 2019. Subsequent proceedings rested on a void foundation and must be treated as

legally null.

5. Page 4 Filler – Fraud on the Court. Instead of attaching the required completed Job Analysis, King County substituted a generic “page 4 filler” text within the KC-2 packet, and mailed only blank Job Analysis forms (KC-3) separately. This created the false appearance that the statutory requirement had been satisfied when, in fact, it had not. Such substitution constitutes fraud on the court under *Hazel-Atlas Glass Co. v. Hartford-Empire Co.*, 322 U.S. 238 (1944), because it misled the tribunal into proceeding as though the statutory predicate for employability had been met.

6. Immediate Expert Compensation. Petitioner respectfully moves that this Court order reasonable compensation for Dr. June Cooley at her established expert rate of \$250.00 per hour, so that her confirmation of the statutory defect may be obtained without further delay. Dr. Cooley’s confirmation is indispensable to establishing that no Job Analysis was ever completed or transmitted. Without her confirmation, Petitioner is prejudiced because the defect remains uncorrected on the record. Payment of her expert fees is therefore necessary as a condition precedent to resolving this jurisdictional defect.

### III. RELIEF REQUESTED

Petitioner respectfully asks this Court to:

1. Take judicial notice of the jurisdictional defect caused by the absence of a completed Job Analysis;
2. Acknowledge Dr. Cooley’s evidentiary role as a globally recognized expert witness confirming this statutory failure;
3. Order reasonable compensation for Dr. Cooley so that her confirmation may be obtained without delay;
4. Recognize that substitution of page 4 filler text for a Job Analysis constitutes fraud on the court; and
5. Treat subsequent proceedings as void, with pension entitlement recognized as vested by law as of July 15, 2019.

DATED: September 25, 2025

  
/s/ Aedin Quinn

Aedin Quinn

1054 Glenwood Avenue SE

Atlanta, GA 30316

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Email: [aedinquinn@gmail.com](mailto:aedinquinn@gmail.com)

SUPREME COURT OF THE STATE OF WASHINGTON

Supreme Court No. 1043279

Court of Appeals No. 863894

and

SUPERIOR COURT OF WASHINGTON  
FOR KING COUNTY

Case No. 23-2-23850-8

AEDIN QUINN,  
Petitioner,

v.

KING COUNTY,  
Respondent.

CERTIFICATE OF SERVICE

I hereby certify that on September 25, 2025, I served a true and correct copy of the following documents:

- Motion for Judicial Notice of Jurisdictional Defect (including Fraud on the Court and Immediate Expert Compensation)
- [Proposed] Order Granting Motion for Judicial Notice of Jurisdictional Defect, Fraud on the Court, and Immediate Expert Compensation

by electronic service through the Washington Appellate Courts Portal (ACORDS) upon counsel for Respondent, and by email copy to Dr. June Cooley for her records.

Service List:

- Tylar Edwards, Deputy Prosecuting Attorney, King County Prosecuting Attorney's Office ,  
– tylar.edwards@kingcounty.gov
- Dr. June Cooley – [email address on record]

Dated: September 25, 2025

/s/ Aedin Quinn  
Aedin Quinn  
1054 Glenwood Avenue SE  
Atlanta, GA 30316  
Phone: 404-992-1235  
Email: [aedinquinn@gmail.com](mailto:aedinquinn@gmail.com)

# AEDIN QUINN - FILING PRO SE

September 25, 2025 - 9:54 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\_20250925095310SC799599\_5732.pdf  
This File Contains:  
Petition for Review  
*The Original File Name was Signed Supreme Court Motion For Judicial Notice Of Jurisdictional Defect.pdf*

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

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- anastasia.sandstrom@atg.wa.gov
- tylar.edwards@kingcounty.gov

#### Comments:

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FILED  
SUPREME COURT  
STATE OF WASHINGTON  
9/25/2025 9:56 AM

BY SARAH R. PENDLETON

CLERK

SUPREME COURT OF THE STATE OF WASHINGTON  
Superior Court No. 1043279 Court of Appeals 863894 Superior Court 23-2-23850-8

AEDIN QUINN,  
Petitioner,

v.

KING COUNTY,  
Respondent.

**[PROPOSED] ORDER GRANTING MOTION FOR JUDICIAL NOTICE OF  
JURISDICTIONAL DEFECT, FRAUD ON THE COURT, AND IMMEDIATE EXPERT  
COMPENSATION**

This matter came before the Court on Petitioner's Motion for Judicial Notice of Jurisdictional Defect, including the issue of abandoned Job Analysis and fraud on the court.

The Court, having reviewed the filings and the record, hereby ORDERS as follows:

1. The Court takes judicial notice that King County failed to perform and transmit a completed Job Analysis to Dr. June Cooley, as required by RCW 51.32.099 and RCW 51.36.010(2)(a). This omission constitutes a jurisdictional defect.
  2. The Court further finds that King County substituted a generic 'page 4 filler' text within the KC-2 packet and mailed only blank Job Analysis forms (KC-3), thereby creating the false appearance of compliance. Such substitution constitutes fraud on the court under Hazel-Atlas Glass Co. v. Hartford-Empire Co., 322 U.S. 238 (1944).
  3. The Court acknowledges Dr. June Cooley's evidentiary role as the attending provider and expert forensic psychologist, whose confirmation is indispensable to establishing this statutory defect.
  4. The Court ORDERS that Dr. June Cooley shall be compensated at her established expert rate of \$250.00 per hour, payable promptly, for her time reviewing and confirming that no Job Analysis was ever performed or transmitted in this case.
  5. The Court finds that because no Job Analysis was ever completed, the statutory process collapsed, and pension entitlement vested by law as of July 15, 2019. All subsequent proceedings are void ab initio.
- IT IS SO ORDERED.

DATED this \_\_\_\_ day of \_\_\_\_\_, 2025.

\_\_\_\_\_  
Honorable Judge Whitehead  
Superior Court of Washington, King County

SUPREME COURT OF THE STATE OF WASHINGTON

Supreme Court No. 1043279

Court of Appeals No. 863894

and

SUPERIOR COURT OF WASHINGTON  
FOR KING COUNTY

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Service List:

- Tylar Edwards, Deputy Prosecuting Attorney, King County Prosecuting Attorney's Office  
– tylar.edwards@kingcounty.gov
- Dr. June Cooley – [email address on record]

Dated: September 25, 2025

/s/ Aedin Quinn  
Aedin Quinn  
1054 Glenwood Avenue SE  
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Phone: 404-992-1235  
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Petition for Review  
*The Original File Name was Signed Order Supreme Court For Judicial Notice Of Jurisdictional Defect.pdf*

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