

**FILED  
SUPREME COURT  
STATE OF WASHINGTON  
7/18/2025 8:55 AM  
BY SARAH R. PENDLETON  
CLERK**

July 18, 2025

**Clerk of Court**  
Supreme Court of the State of Washington  
Temple of Justice  
P.O. Box 40929  
Olympia, WA 98504-0929

**RE: Supreme Court Case No. 1043279**  
**Submission of Motion for Leave to File Supplemental Statement in Support of Petition  
for Review**

Dear Clerk of Court,

Enclosed for filing in the above-referenced matter is a Motion for Leave to File Supplemental Statement in Support of Petition for Review, pursuant to RAP 10.6(c), 13.4, and 13.7.

The filing includes the following documents:

- Motion for Leave (under 10 pages);
- Exhibit B: Supplemental Statement in Support of Petition for Review;
- Certificate of Service.

This supplemental filing addresses a structural due process violation identified in the existing appellate record, particularly the failure to weigh trauma-anchored medical records that were entered into Set 1 prior to the July 7, 2023 denial of disability benefits.

Please file this Motion and supplemental material in the above-referenced docket. I am proceeding pro se and respectfully request the Court's attention to this constitutional matter.

Sincerely,



/s/ Aedin Quinn  
**Aedin Quinn**  
Petitioner, pro se

**\*\*IN THE SUPREME COURT OF THE STATE OF WASHINGTON\*\***

**\*\*Aedin Quinn\*\***,  
Petitioner,

v.

No. 1043279

**\*\*King County\*\***,  
Respondent.

**\*\*MOTION FOR LEAVE TO FILE SUPPLEMENTAL STATEMENT IN SUPPORT OF PETITION  
FOR REVIEW\*\***  
(RAP 10.6(c), RAP 17.4, RAP 13.7)

Petitioner respectfully moves for leave to file a supplemental statement in support of the Petition for Review filed on July 7, 2025. Good cause exists under RAP 10.6 and 13.7 for this Court to grant leave, as set forth below:

1. Petitioner seeks to supplement the Petition for Review to clarify a constitutional due process violation evident from the existing appellate record. Trauma-anchored medical records were part of Set 1 and submitted prior to the July 7, 2023 disability denial order. These records included Grady Hospital imaging reports describing "posttraumatic versus degenerative" injuries to the spine and right hip, relied upon by Dr. Nwosu and later Penn Medicine.
2. Petitioner introduced these records into the trial-level record through citations during hearing testimony and formal submission via the Script portal. The judge was legally required to review the entirety of Set 1 before issuing the July 7, 2023 order. The records were never rebutted by any competing medical report.
3. Despite this, the judge denied disability based on a vague "sprain" theory, without addressing the trauma-anchored records or Dr. Nwosu's unrebutted expert opinion. Petitioner also attempted to ascertain whether defense experts had reviewed these trauma findings, but the denial order remained silent—that is, it offered no confirmation, analysis, or reference to the trauma-based records that had been entered into evidence. This constitutes a structural failure of the adjudicative process and a violation of Petitioner's constitutional right to due process under the Fourteenth Amendment. In constitutional terms, a "structural failure of the adjudicative process" refers to a breakdown so severe that it renders the entire proceeding invalid, regardless of outcome. In this case, the structural failure occurred when the judge ignored or failed to weigh trauma-anchored medical records in Set 1—records that established disabling injury and were never rebutted. The court's reliance on a "sprain" theory without addressing this material evidence reflects a collapse of the procedural safeguards guaranteed by due process.

4. The proposed supplemental statement is attached as Exhibit B. It contains no new evidence, but articulates the legal significance of un rebutted trauma evidence and the constitutional implications of failing to address it. This clarification is necessary for the Court to properly consider whether review is warranted under RAP 13.4(b) and (i).

**\*\*WHEREFORE\*\***, Petitioner respectfully requests leave of this Court to file the attached Exhibit B in support of the Petition for Review.

Dated: July 18, 2025



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Aedin Quinn

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**\*\*EXHIBIT B\*\***

**\*\*Supplemental Statement in Support of Petition for Review\*\***

**\*\*(Judge's Failure to Acknowledge Trauma-Anchored Medical Records Establishing Posttraumatic Causation)\*\***

**(Structural Due Process Error – Failure to Weigh Trauma-Anchored Medical Records in Set 1 Prior to July 7, 2023 Order)**

**\*\*Because no report exists rebutting the trauma-anchored medical records, those records remain legally un rebutted.\*\*** The July 7, 2023 denial of disability benefits was issued despite the judge's access to trauma-anchored medical records contained in Set 1 of the appellate record. These records—submitted via the Script portal and cited during hearings—documented posttraumatic spinal and hip injuries, including language such as "posttraumatic versus degenerative," "edema and inflammatory changes at L3-L5," "irregularity of the right ilium," and soft tissue damage including paralabral cysts and labral tearing.

These trauma-anchored findings—demonstrating posttraumatic causation—were relied upon by Dr. Nwosu, whose expert testimony was un rebutted by any competing medical evidence. The judge failed to acknowledge or weigh these trauma-anchored records, despite their direct relevance to the nature and origin of the disabling injury. Petitioner repeatedly sought to determine whether defense experts reviewed these trauma-based records. However, the July 7, 2023 denial was issued without addressing the records, and instead relied on an unsupported "sprain" theory that contradicted the un rebutted trauma evidence

already in the record.

The judge had a constitutional and legal duty to review all documents in Set 1 before issuing the order. Denying disability while failing to confront this trauma-based evidence constitutes a structural due process violation. The burden of proof was silently shifted onto the injured worker, and the adjudication became constitutionally void. The failure of defendants to rebut (1) the trauma-anchored medical records, and (2) Dr. Nwosu's expert testimony, doubly voids the July 7, 2023 denial. This evidentiary record placed the outcome beyond the Court's ability to lawfully preserve, as no legal or constitutional basis remained to deny benefits—meaning there was no permissible finding the Court could make to support the denial given the unrebutted trauma evidence already in the record. In this posture, the Court cannot rescue the judgment—the evidentiary and procedural breakdown is complete. Specifically:

- The judge ignored trauma-anchored medical records already in Set 1;
- The defendants offered no rebuttal to those records or to Dr. Nwosu's expert testimony;
- The burden of proof was silently and unlawfully shifted to Appellant; and
- Appellant was muted and denied a meaningful opportunity to be heard on the critical question of whether the defense reviewed the trauma-based evidence.

**\*\*Appellant should've never been instructed to build a house on sand that has already collapsed—to appeal a judgment that was structurally void and unconstitutional from the moment it was issued. Immediate relief is mandatory to rectify the due process failure and restore the earned benefits denied under unlawful conditions.\*\***

Relief must now issue under RAP 13.4(i) (constitutional question requiring Supreme Court review) in the form of emergency award of retroactive lost wages and disability benefits, because the denial was constitutionally void ab initio (i.e., void from the beginning and never legally valid). The Court's silence regarding the trauma-anchored medical records, its failure to confront their legal weight, and the silent shifting of the burden of proof resulted in a judgment for which no permissible legal finding could exist. Because the trauma-based evidence remains unrebutted, and because the Court ignored its duty to evaluate that record, review is not optional; it is compelled by constitutional command. **\*\*IMMEDIATE AWARD OF RETROACTIVE LOST WAGES AND DISABILITY BENEFITS IS MANDATORY.\*\*** The constitutional flaw is no longer debatable. The adjudication was constitutionally flawed from the onset. The trial court issued a denial without weighing the trauma-anchored medical records in Set 1, silenced Appellant's attempts to confirm if the defense reviewed them, and relied on an unsupported theory. This structural failure renders the judgment void. Review is compelled by constitutional command under RAP 13.4(i), and immediate relief in the form of retroactive disability benefits and lost wages is mandatory.

**\*\*Denial Enabled by Procedural Suppression\*\***

During the underlying proceedings, Appellant was muted and censored while attempting to confirm whether defense experts had reviewed the trauma-anchored medical records submitted in Set 1. This suppression prevented Appellant from establishing on the record that no rebuttal existed. The subsequent July 7, 2023 denial of disability benefits relied on a vague "sprain" theory without confirming that trauma-based evidence had been considered or rebutted. This amounts to a structural due process violation under *\*Mathews v. Eldridge\** and *\*Goldberg v. Kelly\**, as Appellant was denied a meaningful opportunity to expose the constitutional inadequacy of the defense's position. The judgment is void.

**CERTIFICATE OF SERVICE**

I certify that on July 18, 2025, I served a copy of the foregoing Motion for Leave to File Supplemental Statement in Support of Petition for Review and attached Exhibit B on the following party by U.S. Mail and email:

Tylar Edwards  
King County Prosecuting Attorney's Office  
701 Fifth Avenue, Suite 600  
Seattle, WA 98104-7097  
Email: [tylar.edwards@kingcounty.gov](mailto:tylar.edwards@kingcounty.gov)



/s/ Aedin Quinn  
Aedin Quinn

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**AEDIN QUINN - FILING PRO SE**

**July 18, 2025 - 8:55 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\_20250718085509SC581917\_2193.pdf  
This File Contains:  
Petition for Review  
*The Original File Name was Signed Leave Motion.pdf*

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

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

**Comments:**

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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 20250718085509SC581917**