

FILED
SUPREME COURT
STATE OF WASHINGTON
9/10/2025 9:35 AM
BY SARAH R. PENDLETON

CLERK

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

Case #: 1043279

September 10, 2025

Re: Enclosed Filing — Motion for Leave to Supplement Record (Jurisdictional Defect — No Deadline Applies)

Dear Clerk,


Enclosed please find for filing in the above-referenced matter:

- Motion for Leave to Supplement Record (Jurisdictional Defect — No Deadline Applies);
- Notice of Employer Admission vs. Tribunal Contradiction (“Where’s My Pension Then?”);
- Exhibit MS-1 Cover Sheet (King County HR Headquarters Letter, July 15, 2019);
- Attachment: Web of Entanglement;
- Certificate of Service; and
- [Proposed] Order Granting Motion for Leave.

This motion addresses a jurisdictional defect. As such, it is not subject to waiver or procedural deadlines. The documents are submitted for immediate consideration by the Court.

Thank you for your attention to this filing. Please do not hesitate to contact me if further information is required.

Respectfully,


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

SUPREME COURT OF WASHINGTON

Aedin Quinn, Petitioner

v.

King County, Respondent

Supreme Court Case No. 1043279, Court Of Appeals Division I No. 863894., Superior Court
No. 23-2 23850-8

(and)

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF WASHINGTON

Aedin Quinn, Plaintiff

v.

King County, Defendant

Case No. 2:25-cv-01356-JNW**

MOTION FOR LEAVE TO SUPPLEMENT RECORD

(Jurisdictional Defect — No Deadline Applies)

I. Relief Requested

Petitioner respectfully moves this Court for leave to supplement the record with the attached Notice of Employer Admission vs. Tribunal Contradiction (“Where’s My Pension Then?”), Exhibit MS-1 (HR Headquarters Letter, July 15, 2019), and Attachment: Web of Entanglement.

II. Governing Law

- RCW 51.32.090(4): Time-loss continues until return to work, proof of employability, or pension determination.
- Structural Error: *Arizona v. Fulminante*, 499 U.S. 279 (1991) — burden-shifting errors are structural and void the proceeding.
- Fraud on the Court: *Hazel-Atlas Glass Co. v. Hartford-Empire Co.*, 322 U.S. 238 (1944) — concealment of records voids judgments even years later.
- Automatic Reversal: *United States v. Gonzalez-Lopez*, 548 U.S. 140 (2006) — structural violations compel reversal.

III. Basis for Motion

The tribunal’s finding at Page 11, Lines 11–14, Set 1 that Appellant “did not prove unemployability” directly contradicts:

- Exhibit MS-1 (HR Headquarters Letter, July 15, 2019): Admission that Appellant could not perform essential functions, with or without accommodation.
- Exhibit 3F (BIIA Pension Letter, July 12, 2019): Recognition of pension entitlement.

- Virginia Mason MRI (Jan. 7, 2018): Objective trauma evidence concealed from the tribunal.

IV. Relief Requested

Petitioner asks this Court to:

1. Grant leave to supplement the record with the attached Notice, Exhibit MS-1, and Web of Entanglement.
2. Recognize these contradictions as jurisdictional defects.
3. Declare the April 14, 2019 termination and July 7, 2023 denial void ab initio.
4. Order retroactive time-loss restored through July 12, 2019, with pension commencing from that date forward.

Respectfully submitted,
September 10, 2025

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

NOTICE OF EMPLOYER ADMISSION VS. TRIBUNAL CONTRADICTION

I. Tribunal Finding (Page 11, Lines 11–14, Set 1, Appellate Record)

“Based on the entire record, there is insufficient evidence to show Mr. Quinn was unable to perform or obtain reasonable continuous gainful employment during the period of February 23, 2019 through June 17, 2019 or as of October 28, 2019.”

II. Employer's Own Admission (Exhibit MS-1, King County HR Headquarters Letter, July 15, 2019)

“King County is proceeding with a medical separation. The decision to medically separate you is based on the information we have at this time which indicates you are unable to perform the essential functions of your Transit Operator position including regular and reliable attendance, either with or without accommodation.”

III. The Contradiction

- Tribunal: “Insufficient evidence of unemployability.”
- Employer (HR Headquarters): “You are unable to perform essential functions, with or without accommodation.”

These statements are irreconcilable. The HR headquarters letter (Exhibit MS-1) is a binding party-opponent admission under FRE 801(d)(2).

IV. Legal Consequence

- Under RCW 51.32.090(4), time-loss continues until a worker returns to work, employability is proven by substantial medical evidence, or a pension determination is made.
- By July 2019, both Exhibit 3F (BIHA Pension Letter) and Exhibit MS-1 (HR Headquarters Letter) satisfied the pension trigger.
- The tribunal's contrary finding on Page 11 is a jurisdictional defect, void under *Arizona v. Fulminante*, *Hazel-Atlas*, and *Gonzalez-Lopez*.

V. Bottom Line

When King County HR Headquarters admits unemployability in Exhibit MS-1 (July 15, 2019), the tribunal's Page 11 finding of “insufficient evidence” collapses. The lawful pension start date is July 2019, and the denial is void ab initio.

Respectfully submitted,
September 10, 2025

EXHIBIT MS-1

(Filed Concurrently with Notice of Contradiction)

Description:

Exhibit MS-1 is the King County Human Resources Headquarters letter, dated July 15, 2019, stating in the first paragraph, third sentence:

"King County is proceeding with a medical separation. The decision to medically separate you is based on the information we have at this time which indicates you are unable to perform the essential functions of your Transit Operator position including regular and reliable attendance, either with or without accommodation."

Relevance:

- This admission directly contradicts the tribunal's finding at Page 11, Lines 11–14, Set 1 of the appellate record, which claimed there was "insufficient evidence" of unemployability.
- Filed together with Notice of Employer Admission vs. Tribunal Contradiction — 'Where's My Pension Then?' to demonstrate the jurisdictional defect.

Record Note:

Exhibit MS-1, along with Exhibit 3F (BIIA Pension Letter, July 12, 2019), was received by Appellant via USPS and filed in Appellant's personal file cabinet upon receipt. Both are contemporaneous records confirming unemployability and pension entitlement.

ATTACHMENT: WEB OF ENTANGLEMENT

- Dr. Cooley (April 14, 2019 evaluation):
Misused as proof of "stability/employability," when it actually warned there was *no guarantee dissociative episodes wouldn't recur*.
- Exhibit 3F (BIIA Pension Letter, July 12, 2019):
Should have triggered immediate pension under RCW 51.32.090(4)(c), but was buried in returned files and ignored.
- Virginia Mason MRI (Jan. 7, 2018):
Documented permanent trauma (disc desiccation, L5 void of fluid), but was concealed from consideration.

Fraud Pattern:

Each of these three records independently proves Appellant's entitlement, yet the tribunal flipped the burden and claimed the record was "insufficient." This web of entanglement is the fraud overlay that makes the July 7, 2023 denial void ab initio.

SUPREME COURT OF WASHINGTON

Aedin Quinn, Petitioner

v.

King County, Respondent

Case Nos. 1043279, [second no.], [third no.]

(and)

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF WASHINGTON

Aedin Quinn, Plaintiff

v.

King County, Defendant

Case No. 2:25-cv-01356-JNW**

[PROPOSED] ORDER GRANTING MOTION FOR LEAVE TO SUPPLEMENT
RECORD

This matter comes before the Court on Petitioner's Motion for Leave to Supplement Record (Jurisdictional Defect — No Deadline Applies). The Court has reviewed the Motion and supporting materials, including the Notice of Employer Admission vs. Tribunal Contradiction, Exhibit MS-1, and the Attachment: Web of Entanglement.

IT IS HEREBY ORDERED:

1. Petitioner's Motion for Leave is GRANTED.
 - Exhibit MS-1 (King County HR Headquarters Letter, July 15, 2019),
 - Exhibit 3F (BIIA Pension Letter, July 12, 2019), and
 - Virginia Mason MRI (January 7, 2018), together with the Web of Entanglement summary.
2. Because these records directly contradict the tribunal's finding at Page 11, Lines 11–14 of the appellate record, supplementation is jurisdictional in nature and not subject to waiver or deadlines.

SO ORDERED this ____ day of September, 2025.

Judge/Justice _____

Supreme Court of Washington / U.S. District Court, W.D. Wash.

CERTIFICATE OF SERVICE

I certify that on September 10, 2025, I served a true and correct copy of the foregoing Motion for Leave to Supplement Record, together with the attached Notice of Employer Admission vs. Tribunal Contradiction, Exhibit MS-1, and Web of Entanglement, by depositing the same in the U.S. Mail, postage prepaid, addressed as follows:

Supreme Court of Washington
Clerk's Office
Temple of Justice
P.O. Box 40929
Olympia, WA 98504-0929

Hon. Judge Whitehead
U.S. District Court, Western District of Washington
700 Stewart Street, Suite 2310
Seattle, WA 98101

Tylar Edwards, Deputy Prosecuting Attorney
King County Prosecuting Attorney's Office
tylar.edwards@kingcounty.gov

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

Dated: September 10, 2025



Aedin Quinn



King County

Department of Transportation
Metro Transit

www.kingcounty.gov

July 15, 2019

Aedin Quinn
3606 S. 180th Street, Apt. C12
Seattle, WA 98188

Dear Aedin,

This letter is a follow-up to the information you received from Transit Disability Services regarding your proposed medical separation. Based on all the available information, and after careful consideration, King County is proceeding with a medical separation. The decision to medically separate you is based on the information we have at this time, which indicates you are unable to perform the essential functions of your Transit Operator position, including regular and reliable attendance, either with or without reasonable accommodation. The effective date of your medical separation is July 12, 2019.

To assist you in making informed choices about the medical separation from your employment with King County, I am providing you with the following information:

Reasonable Accommodation in Employment for Individuals with Disabilities Policy:

In accordance with the King County Reasonable Accommodation in Employment for Individuals with Disabilities policy (PER-22-4-3), King County offers a Reassignment Program to assist employees unable to continue in their jobs due to medical restrictions. A copy of this policy was mailed to you by Sara Schmitz. The reassignment program includes priority rehire rights for up to six months from the date of entry into the program, for non-promotional King County jobs that you are qualified to perform. You have two years to initiate your Reassignment Rights (until July 12, 2021) and would contact Jamie Christensen at (206) 263-6730.

King County Job Openings:

At any time you may view information and apply for any King County job openings at <http://www.kingcounty.gov/jobs.aspx>.

Exhibit MS-1

BEFORE THE BOARD OF INDUSTRIAL INJURY APPEALS
STATE OF WASHINGTON

2400 4th Ave, Suite 500, Seattle, WA 98104

Olympia, Washington 98504 206-343-8800 ext 100

(360) 755-1234

Exhibit 3f

Sealed
Availability
Awards

Name: Aedin Quinn
Claim Number: SK16589

Notice of Appeal [Print](#) [Close](#)

Today's date: 7/12/2019
Appeal filed by: Attorney
Appeal filed on behalf of: Worker/Claimant
First name: Aedin
Middle name:
Last name: Quinn
Address: 3606 S 180th Street C12
City: Sea Tac
State: WA
Zip Code: 98188
Home telephone:
Work telephone:
Interpreter needed: No
Language:
L&I Claim number: SK16589
Date of L&I decision: 06/17/2019
Is this an occupational disease that occurred at a Hanford Nuclear Site? No
Date of injury/occupational disease: 07-27-2017
City where injury/occupational disease occurred:

This copy is sent to you for your information from the offices of
Calbom & Schwab P.S.C.

What are you asking for:

Due to the claimant's injuries he is totally and permanently disabled and is entitled to time loss compensation and pension benefits, or in the alternative, treatment and a much greater permanent partial disability award and for such other benefits as may be proper

Company name: King county
In care of:

Mailing address: 500 4TH AVE, SUITE 500
City: Seattle
State: WA
Zip code: 98104

Preparer full name: Sheila Sanchez

Attorney name: Jeffrey Schwab

Attorney bar: 24702

Exhibit 57C

1 of 2

Aedin Quinn

1

June Cooley, Psy.D., R.N.
Nancy Loeb, M.S., L.P.C.
Nadim Ali, L.P.C.
BJ Bower, L.C.S.W.

Metro Atlanta Psychological Services

6 Concourse Parkway
Suite 1650
Atlanta, Georgia 30328
(770) 417-2733

Fit for Work Evaluation

Name: Aedin Quinn

Date of Birth: [REDACTED]

Age: [REDACTED]

Date(s) of testing: 2/27/2019, 3/21/2019

Date of report: 4/14/2019

Tests Administered:

Clinical Interview
Mental Status Exam
Medical Record Review
Minnesota Multiphasic Personality Inventory-Adult (MMPI-2)
Million Clinical Multiaxial Inventory III (MCMI-III)
Bender Visual Motor Gestalt Test

Exhibit 57C

2022

Aedin Quinn

5

Anticipation of their recurrence may result in persistent anxious symptoms, such as difficulty in sleeping, exaggerated startle response, or a protective numbing and detachment.

Mr. Quinn reports the following symptoms: apathy, guilt, memory loss, exaggerated startle response, nightmares, intrusive thoughts, emotionally detached, insomnia, anxiety, social isolation, crowd avoidance, depression, suspiciousness, lack of pleasure, lack of motivation, hyper-vigilance, irritability, anger outbursts, and flashbacks.

Diagnostic Impression:

300.02 Generalized Anxiety Disorder

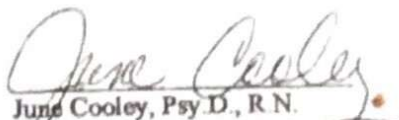
309.81 Posttraumatic Stress Disorder

301.40 Obsessive Compulsive Personality Disorder with Schizoid Personality Features and Schizotypal Personality Features

Summary and Recommendations:

Mr. Quinn reports that on 07/27/2017 he was involved in an accident while operating a coach 4531 for Kings County Department of Transportation. He states that he does not remember much of what happened during this accident. He reports that he does not remember how the coach travel on top of the median. Mr. Quinn states that he is thankful that he did not harm anyone. He reports that since that time he has had a similar dissociative episode, this occurred 11/5/2018. He reports that he was relieved when he realized that he was a passenger on the coach and was not operating a coach. He reports that he is afraid that he may harm someone in the future and reports that he is psychologically impaired.

Mr. Quinn is experiencing severe psychological symptoms and he is not fit to return to work.


June Cooley, Psy.D., R.N.
Licensed Clinical Psychologist

AEDIN QUINN - FILING PRO SE

September 10, 2025 - 9:35 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_20250910093455SC151135_9393.pdf
This File Contains:
Petition for Review
The Original File Name was Signed Motion To Leave To Supplemenmt Record.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 20250910093455SC151135