

FILED
SUPREME COURT
STATE OF WASHINGTON
8/22/2025 10:19 AM
BY SARAH R. PENDLETON
CLERK

WASHINGTON SUPREME COURT

Aedin Quinn, Appellant

v.

King County, Respondent

No. 1043279

NOTICE OF JURISDICTIONAL COLLAPSE

(Relating to Void #5, Void #7, and Void #15)

Appellant respectfully notifies this Court that the July 7, 2023 denial order is void ab initio due to jurisdictional structural collapse and fraud on the court. Three independent void grounds exist:

1. Void #5 — Jurisdictional Structural Error: Silent burden shifting combined with muting of Appellant during a critical hearing.

2. Void #7 — Jurisdictional Fraud on the Court (Umbrella Defect): Concealment of the January 7, 2018 Virginia Mason MRI allowed false IME/MMI 'stabilized' findings to be presented and adopted. The denial order further declared 'insufficient evidence' despite trauma-confirming MRIs (Virginia Mason 2018, Grady 2020, South Baptist 2022, Penn Medicine 2025). The Court of Appeals compounded the error by affirming on the same false premise.

3. Void #15 — Jurisdictional Fraud on the Court: False statement at page 7, line 39 of the denial order that Dr. Nwosu 'stood alone,' when in fact the Virginia Mason MRI directly corroborated his testimony.

Governing Principles:

- Hazel-Atlas Glass Co. v. Hartford-Empire Co., 322 U.S. 238 (1944) — Fraud on the court voids a judgment ab initio. Such jurisdictional defects are not subject to deadlines or waiver.
- Arizona v. Fulminante, 499 U.S. 279 (1991) — Structural errors mandate automatic reversal and cannot be excused as harmless.


Conclusion:

Each Void independently collapses jurisdiction; together they prove that the July 7, 2023 denial order never had lawful force. Appellant respectfully

demands vacatur of the order and retroactive restoration of disability benefits. Because these defects are jurisdictional, there is no deadline for this filing.

Signature block for NOTICE OF JURISDICTIONAL COLLAPSE

Respectfully submitted,


/s/ Aedin Quinn
1054 Glenwood Avenue SE
Atlanta, GA 30316
Tel: (404) 992-1235
Email: aedinquinn@gmail.com
Dated: August 22, 2025

MOTION TO VACATE VOID JUDGMENT

(Void #5 — Jurisdictional Structural Error: Silent Burden Shift + Muting)

The July 7, 2023 denial order is void because it rested on a silent shift of the burden of proof to Appellant, without notice, and because Appellant was muted during a critical hearing. These combined defects stripped Appellant of the right to clarify the record and to defend against contested allegations. This constitutes structural error under Fulminante and fraud on the court under Hazel-Atlas. Such jurisdictional collapse voids the judgment ab initio and is not subject to deadlines.

Relief requested:

Vacatur of the July 7, 2023 denial order; retroactive reinstatement of disability benefits without limitation; removal of any pension caps imposed under the fraudulent denial framework; and recognition that all related claims and findings resting on the "sprain/stabilized" narrative are nullified and collapsed ab initio as fraud on the court.

Respectfully submitted,



/s/ Aedin Quinn

1054 Glenwood Avenue SE

Atlanta, GA 30316

Tel: (404) 992-1235

Email: aedinquinn@gmail.com

Dated: August 22, 2025

MOTION TO VACATE VOID JUDGMENT

(Void #7 — Jurisdictional Fraud on the Court: Concealment of Virginia Mason 1/7/2018 exhibit 8K spine MRI & False IME/MMI 'Stabilized' Findings + False 'Insufficient Evidence' Finding)

The tribunal relied on IME/MMI findings that Appellant had 'stabilized.' These findings were rendered false by the January 7, 2018 Virginia Mason spine MRI, which documented trauma-anchored pathology. Concealment of this MRI voids the judgment under Hazel-Atlas and constitutes structural collapse under Fulminante. This jurisdictional defect is not subject to deadlines.

The July 7, 2023 denial order further falsely declared 'insufficient evidence' set 1, page 11, line 15-17 of disability proximately caused by the July 27, 2017 accident. This was contradicted by trauma-confirming MRIs documenting worsening pathology:

- Virginia Mason spine MRI (Jan. 7, 2018) exhibit 8K: Disc desiccation, annular tear, bulges, and height loss.
- Grady MRI (Jan. 2020): Ligamentum flavum thickening, epidural lipomatosis, severe thecal sac narrowing.
- South Baptist (2022): Right hip labral tear and right ilium osseous trauma sequelae.
- Penn Medicine Feb. 6, 2025 severe spinal stenosis spine MRI, Dr Nwosu's augmented surgery Apr. 15, 2025 after reviewing Penn Medicine 2/6/2025 severe spinal stenosis spine MRI to: two-level fusion, laminectomy, cage, screws.

A soft-tissue 'sprain' cannot cause these findings. IME/MMI assertions that the injuries stabilized set 1, page 7, line 45 or resolved set 1, page 7, line 34 were medically baseless. The Court of Appeals compounded the defect by affirming reliance on false IME/MMI findings and disregarding record-anchored trauma MRIs.

The denial order at set 1, page 12, line 38, also falsely found no permanent partial disability proximately caused by the 2017 accident, and at set 1, page 12, line 42, falsely found no permanent total disability as of October 28, 2019. Both are disproven by Virginia Mason (2018), Grady (2020), South Baptist (2022), and Penn (2025). Together, these findings show that the tribunal falsely ruled 'no proximate cause' and 'no disability' despite every facility documenting progressive trauma.

Because of these defects, the order is void ab initio under Hazel-Atlas and Fulminante. There is no deadline to raise this challenge.

Relief requested:

Vacatur of the July 7, 2023 denial order; retroactive reinstatement of disability benefits without limitation; removal of any pension caps imposed under the fraudulent denial framework; and recognition that all related claims and findings

resting on the "sprain/stabilized" narrative are nullified and collapsed ab initio as fraud on the court.

Signature block for Void #7

Respectfully submitted,


/s/ Aedin Quinn

1054 Glenwood Avenue SE

Atlanta, GA 30316

Tel: (404) 992-1235

Email: aedinquinn@gmail.com

Dated: August 22, 2025

MOTION TO VACATE VOID JUDGMENT

{Void #15 — Jurisdictional Fraud on the Court: False Statement that 'Dr. Nwosu Stood Alone'}

The denial order at page 7, line 39, set 1, falsely stated that 'Dr. Nwosu stood alone.' This was materially false: Virginia Mason January 7, 2018 spine MRI exhibit 8K directly corroborated Dr. Nwosu's testimony. Sustaining judgment on this falsity is fraud on the court and constitutes jurisdictional collapse under Hazel-Atlas and Fulminante.

Relief requested:

Vacatur of the July 7, 2023 denial order; retroactive reinstatement of disability benefits without limitation; removal of any pension caps imposed under the fraudulent denial framework; and recognition that all related claims and findings resting on the "sprain/stabilized" narrative are nullified and collapsed ab initio as fraud on the court.

Respectfully submitted,



/s/ Aedin Quinn

1054 Glenwood Avenue SE

Atlanta, GA 30316

Tel: (404) 992-1235

Email: aedinquinn@gmail.com

Dated: August 22, 2025

CERTIFICATE OF SERVICE

I certify that on August 22, 2025, I served a true and correct copy of the foregoing Notice of Jurisdictional Collapse and Motions to Vacate Void Judgment (Voids #5, #7, #15) on counsel for Respondent King County:

Counsel:

Tylar Edwards

King County Prosecuting Attorney's Office

500 Fourth Avenue, Suite 900

Seattle, WA 98104

Dated: August 22, 2025

Firm/Agency: _____

Street Address: _____

City/State/ZIP: _____

Email: _____ E-service ID: _____

Method(s) of Service (check all that apply):

☐ Washington Supreme Court e-filing portal ☒ Email (by consent) ☒ U.S. Mail ☐ Hand Delivery

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Respectfully submitted,


/s/ Aedin Quinn

Dated: August 22, 2025

Exhibit 8K

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.

AEDIN QUINN - FILING PRO SE

August 22, 2025 - 10:18 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_20250822101802SC638184_8049.pdf
This File Contains:
Petition for Review
The Original File Name was Signed Notice Of Jurisdictional Collapse.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
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1054 Glenwood Avenue SE
Atlanta, GA, 30316
Phone: (206) 849-6321

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