SUPREME COURT STATE OF WASHINGTON 9/18/2025 9:57 AM BY SARAH R. PENDLETON CLERK

Supreme Court No. 1043279

Court of Appeals No. 863894

Superior Court No. 23-2-23850-8

COVER SHEET FOR MOTION TO SUPPLEMENT RECORD

Title: Motion to Supplement Record with Medical Separation Documents (MS-1, MS-2, MS-3, KC-2, KC-3)

Filed by: Aedin Quinn, Petitioner, Pro Se

Dated: September 18, 2025

SUPREME COURT OF THE STATE OF WASHINGTON

Supreme Court No. 1043279

Court of Appeals No. 863894

Superior Court No. 23-2-23850-8

MOTION TO SUPPLEMENT RECORD

I. RELIEF REQUESTED

Petitioner respectfully requests leave to supplement the record with the original Medical Separation documents (MS-1, MS-2, MS-3, KC-2, KC-3), which conclusively establish that pension entitlement vested July 15, 2019.

II. BASIS FOR MOTION

1. Hard Evidence. MS-1 and MS-3 — issued by King County HR and Petitioner's Union — are binding admissions that Petitioner was unable to perform essential functions. KC-2 corroborates. These documents triggered pension entitlement under RCW 51.32.090(4)(c).

2. Blank Job Analysis (KC-3, Page 3E; KC-2, Page 4).

RCW 51.32.090(4)(c) and RCW 51.32.099 require a completed Job Analysis to be submitted to the attending provider. Instead, Petitioner received only blank Job Analysis forms (KC-3, authenticated 9/12/2025) and a substituted page 4 in the Rhonda Berry Medical Separation packet (KC-2).

That page is generic policy text, not a completed Job Analysis. This substitution is not clerical — it is jurisdictional. Without a completed Job Analysis, no lawful basis existed to deny pension.

3. Suppression = Unlawful Withholding. These documents were suppressed from the record. Suppression vitiates jurisdiction. The resulting denial was an unlawful deprivation of a vested pension, akin to theft of earned retirement wages.

4. Prolonged Litigation as Delay. The continued proceedings after July 15, 2019 served no lawful purpose and functioned only as delay designed to force hardship and discourage pursuit of vested benefits.

NOTICE OF VOID AB INITIO (MS-1, MS-3, KC-2, KC-3): The July 7, 2023 denial is VOID ab initio because pension vested by law on July 15, 2019. Subsequent proceedings lacked jurisdiction.

NOTICE OF FRAUD ON THE COURT (KC-2 & KC-3): The substitution of generic text in KC-2 and blank Job Analysis forms in KC-3 constitutes fraud on the court, which vitiates all judgments based on a corrupted record.

III. REQUEST FOR EXPEDITED CONSIDERATION

This amendment is narrowly tailored, presenting evidence that is both dispositive and jurisdictional. Granting permission now will shorten proceedings by correcting the record and preventing further delay.

IV. CONCLUSION

Litigation ended on July 15, 2019, when MS-1, MS-2, MS-3, and KC-2 vested Petitioner's pension by law. Every proceeding since rests on a suppressed record and is void ab initio. King County has been caught withholding a vested pension — conduct akin to theft of earned retirement wages.

Dated: September 18, 2025

/s/ Aedin Quinn

Aedin Quinn, Petitioner, Pro Se 1054 Glenwood Avenue SE Atlanta, GA 30316 Phone: (404) 992-1235 Email: aedinquinn@gmail.com

SUPREME COURT OF THE STATE OF WASHINGTON

Supreme Court No. 1043279

Court of Appeals No. 863894

Superior Court No. 23-2-23850-8

AMENDED [PROPOSED] ORDER DECLARING JULY 2019 PENSION ENTITLEMENT AND VACATING VOID JUDGMENT

FINDINGS:

- 1. Petitioner has shown that King County suppressed Medical Separation documents (MS-1, MS-3, KC-2). This suppression constitutes fraud and misconduct.
- 2. The Medical Separation documents conclusively establish that pension entitlement vested by operation of law on July 15, 2019. The July 7, 2023 denial of benefits was therefore void ab initio. Any judgment entered thereafter is a legal nullity.
- 3. The absence of a completed Job Analysis (KC-2, Page 4; KC-3, blank Job Analysis forms received in original postmarked envelopes and authenticated on September 12, 2025) renders the July 7, 2023 denial unlawful and void.

ORDER:

Pension entitlement is declared to have vested July 15, 2019. The July 7, 2023 denial of benefits is declared VOID ab initio. King County shall immediately reinstate pension benefits retroactive to that date with statutory interest and compensate Petitioner for all economic damages.

IT IS SO ORDERED.

TED:		

SUPREME COURT OF THE STATE OF WASHINGTON

Supreme Court No. 1043279

Court of Appeals No. 863894

Superior Court No. 23-2-23850-8

CERTIFICATE OF SERVICE

I hereby certify that on September 18, 2025, I served a true and correct copy of the Motion to Supplement Record, [Proposed] Order, and Cover Sheet by email and U.S. Mail to:

Tylar Edwards

King County Prosecuting Attorney's Office

tylar.edwards@kingcounty.gov

DATED: September 18, 2025

/s/ Aedin Quinn

Aedin Quinn, Petitioner, Pro Se

1054 Glenwood Avenue SE

Atlanta, GA 30316

Phone: (404) 992-1235

Email: aedinquinn@gmail.com

King County
METRO
Transit Disability Services
King Street Center
KSC-TR-0230
201 South Jackson Street
Seattle, WA 98104



Aedin Quinn 3606 S 180th St, Apt C-12 SeaTac, WA 98188

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Street Center -TR-0230 South Jackson Street tle, WA 98104



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

Exhibit &



Department of Transportation Metro Transit Human Resources Section KSC-TR-0230 201 South Jackson Street Seattle, WA 98104-3856 206-477-6000 TTY Relay: 711 www.kingcounty.gov

October 9, 2018

RE: Aedin Quinn / DOB: 05-01-1963

Dear Physician:

As you may know, Aedin Quinn is employed with Metro Transit as a Transit Operator and is currently on a medical leave of absence due to an on the job injury. As Aedin's treating physician, I would like for you to provide me with an updated objective medical opinion regarding his/her medical condition, return-to-work status and ability to provide predictable and reliable attendance. The information you provide shall remain confidential and will only be used in the interactive process to identify possible reasonable workplace accommodations.

Please answer the following questions:

- Please provide Aedin's current medical diagnosis and prognosis for recovery:
- Will Aedin be able to return to work and perform all the essential functions
 of his/her Transit Operator position? A copy of the Transit Operator Job
 Analysis is attached for your reference.
- 3. Is Aedin currently able to perform predictable and reliable attendance as a Transit Operator? If not, please indicate when Aedin will be able to perform predictable and reliable attendance.

Exhibit KC-1 P924I

Aedin Quinn October 9, 2018 Page 2

The treating physician letter should be faxed to (206) 899-1555, Attn. Diana Wurn by October 30, 2018. This fax machine is located in the offices of Transit Disability Services to help preserve the confidentiality of the documents received.

The goal of this interactive process is to explore your ability to perform the essential functions of your job, including predictable and reliable attendance on a sustained basis; and how Transit can reasonably accommodate your medical condition.

If you believe you need assistance with issues that are impacting your ability to work, please contact the Making Life Easier program at (888) 874-7290.

I am available to answer your questions and provide you with assistance in this process. Please contact me at (206) 477-5999.

Sincerely,

Diana Wurn

Transit Disability Services

cc: Tutti Compton, Chief of Atlantic Base Operations

Enc: Treating physician letter

Exhibit 10-3



Disability Services

Safety and Claims Management

Department of Executive Services Human Resources Management Division 500 4th Ave Rm 500 Seattle, WA 98104

(206) 205-8575 (206) 296-0514 FAX

JOB ANALYSIS

Job Title:	Transit Operator	DOT Title:	Bus Driver (motor trans.)	
SVP:	4	DOT #:	913.463-010	
Location of Analysis:		Name of Employee:		
Analyst:	Kyle Pletz, VRC, CDMS	JA Source:	Laura Merritt	
Presenting VRC:		Employer Contact:	Dennis Lock	
Date Analysis Completed:	7/1/16	Supervisor Contact Information	Phone: 206-684-2816 E-mail: dennis lock@kingcounty.gov	

○ On-Site	Interview	Representative
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JOB DUTIES:

Essential Functions according to the employer:

All King County jobs require ability/essential function to:

Demonstrate predictable, reliable, and timely attendance

Follow written and verbal directions to complete assigned tasks on schedule.

Read, write, and communicate in English & understand basic math.

Learn from directions, observations, and mistakes and apply procedures using good judgment.

Work independently or as part of a team and interact appropriately with others.

This is a safety sensitive position and the employee is subject to random drug testing and other conditions as required to maintain a Commercial Driver's License (CDL). The employee must be able to operate diesel or electric-powered mass transit vehicles, collect passenger fares, issue passes, provide fare, route and schedule information, and comply with federal requirements under the Americans with Disabilities Act (ADA) for announcing stops.

- Regularly and safely operate a transit coach on a pre-determined route and schedule; in order to transport passengers for a large public transportation system.
- Comply with all traffic laws and rules, state/federal regulations, Metro Transit policy and procedures in order to provide safe and reliable service.
- 3. Perform inspection of coach before going on-route in order to provide safe and reliable service.
- 4. Operate transit coach using both hands on the steering wheel without interference.
- Interact appropriately with the public and co-workers in order to provide positive customer services and the safe transport of passengers.
- Assist passengers with limited mobility by operating an electronic lift or utilizing a ramp, lifting backing bus seats and kneeling to secure wheelchairs with straps and seat belts.
- 7. Change the destination sign.
- Respond to emergency situations and apply braking and steering (to include pressure to arms, legs, and hands generated while bracing one's self during such maneuvers).
- Provide evacuation assistance to all customers, including physically assisting the elderly, customers with disabilities and young customers during emergency situations. As needed, use a fire

Exhibit MS-1



Department of Transportation Metro Transit www.kingcounty.gov

July 15, 2019

Aedin Quinn 3606 S. 180th Street, Apt. C12 Seatac, 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 <u>July 12</u>, **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-2



King County

Department of Transportation Metro Transit

Human Resources Section

KSC-TR-0230 201 South Jackson Street Seattle, WA 98104-3856 206-477-6000 TTY Relay: 711 www.kingcounty.gov

July 15, 2019

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

Dear Aedin:

This letter is a follow-up to letter from your chief which notified you of your non-disciplinary medical termination (NDMT) from the position of Transit Operator. I am enclosing some materials which would have been given to you in our scheduled meeting. Since you were unable to attend, I am mailing the information. Please read through the enclosed information and sign and return them to me at the address noted above.

I am available to answer any questions you have regarding the information by phone at (206) 263-3316 or by email at sschmitz@kingcounty.gov.

Sincerely.

Sara M. Schmitz

Transit Disability Services

Mattel Schnitz

cc: Disability Services File

Exhibit MS-3

AMALGAMATED TRANSIT UNION LOCAL 587

2815 Second Avenue, Suite 230 Seattle, Washington 98121 Telephone (206) 448-8588 Fax: (206) 448-4482 1-800-847-4696 www.atu587.org

O HEREDON

AFFILIATED WITH AFL-CIO WASHINGTON STATE LABOR COUNCIL KING COUNTY LABOR COUNCIL

OLYMPIC
LABOR COUNCIL
NORTHWEST JOINT
CONFERENCE BOARD
AMALGAMATED
TRANSIT UNION
LEGISLATIVE COUNCIL
KING COUNTY
COALITION OF UNIONS



AEDIN QUINN 3606 S 180TH ST SEATAC, WA 98188

Dear AEDIN

I have received a copy of a notice to you from METRO/KING COUNTY regarding your Non-Disciplinary Medical Termination. If you believe this action to be in violation of the labor agreement or for any other reason unjust, you have the right to file a grievance within 15 days from the date of your notification.

I am concerned about the appropriateness of management's action since I am unfamiliar with the specific details regarding this matter. Therefore, I would appreciate it if you would contact the Union office and let us know if you are interested in filing a grievance. We have no desire to pry into your personal life or into your working relationship with management. Our offer is intended only to provide you with assistance and guidance if you wish to pursue a grievance.

If you chose to accept your non-disciplinary medical termination, and are approved for service retirement you may stay in the Retiree Chapter or apply for a Withdrawal Card. If you stay in the Retiree Chapter you can transfer back to "active member" without a Withdrawal Card within one year's time should you be able to return to work. As long as you remain a member, Local 587 will continue to pay limited attorney fees for your L&I claim

In addition, as a retiree all the union membership benefits of retired status will be yours. This entitles you to receive the In Transit from the International, attend the monthly meetings of our retired members and, most importantly, you maintain your International and Local funeral benefit totaling up to \$1,400.00. The dues for a retired member are only \$4.50 per month. However, if you have already filed a grievance or have decided not to pursue this matter, please disregard this notice.

If you believe you will become eligible to return to work, and would like to stay on reduced dues, you may do so for up to two years. Please contact the Union Office within 15 days of receipt of this letter to confirm.

Please give me a call if you have any questions.

In solidarity,

Ron Anderson Vice President ATU Local 587

KEN PRICE

President
Business Representative
kprice.president@atu587.org

RON ANDERSON

Vice President
Assignest Business Representative randerson vp1@atu587.org

CORY RIGTRUP

Vice Presiden Manacanna Assistant Business Representative crigtrup.vp2@atu587.org PATRICK BRADY

Financial Secretary
Treaturer
pbrady finsec@atu587.org

ТАМІЕКО СООК

Recording Secretary Correspondent to In Transit toook.recsec@atu587.org Document Code No.: PER-22-4-3-EP

KC-2 P9 1

Title: Reasonable Accommodation in Employment for Individuals with

Affected Agencies: All Executive Branch Agencies of King County Government Authorities: ADA, as amended, WLAD Chapter 49.60 RCW, WIIA Title 51 RCW, KCC Chapter 3.12, KC Policy PER-26 (AEP), KC Personnel Guidelines

Keywords: Disability, Reasonable Accommodation

Sponsoring Agency: Department of Executive Services, Human Resourcing County

Executive signature: Date signed and effective:

1. Purpose

This policy replaces and supersedes PER 22-4-2 (AEP), Disability Accommodation in Employment, April 22, 2004.

This policy is intended to guide King County in providing reasonable accommodations in employment to qualified individuals with disabilities consistent with federal and state law.

This policy is a general statement of King County's administrative policies and procedures and: (a) does not create a private right of action; (b) does not limit the reasons for dissolution of the employment relationship; and (c) does not constitute an express or implied contract.

Applicability and Purpose This policy applies to all King County Executive Branch departments and agencies.

III. References

- A. The Americans with Disability Act (ADA), as amended
- B. Washington Law Against Discrimination Chapter 49.60 RCW
- C Washington Industrial Insurance Act Title 51 RCW
- D. King County Code Chapter 3.12 (Personnel System)
- E. King County Policy PER 22-6 (AEP) "Transitional Duty for Employees with Temporary Medical Restrictions"
- F. King County Personnel Guidelines
- IV. Definitions King County's definitions are intended to be consistent with the ADA, as amended, and the Washington Law Against Discrimination.
 - "Disability" "Disability" means the presence of a sensory, mental, or physical impairment that: is medically cognizable or diagnosable; or exists as a record or history. A disability exists whether it is temporary or permanent, common or uncommon, mitigated (e.g., corrected with medication) or unmitigated, or whether or not it limits the ability to work generally or work at a particular job, or whether or not it limits any other activity as provided in law. For purposes of reasonable accommodation, an employee also is disabled if he or she has a physical or mental impairment that substantially limits a major life activity or that substantially limits the employee's ability to perform his or her job.
 - B. "Disability Services Program" The Disability Services Program is a program within the Executive Branch's Human Resources Division and Transit Division that assists in providing reasonable accommodations in employment to qualified individuals with disabilities.

Exhibit KC-Z PAGE 2

Document Code No.: PER-22-4-3-EP
Title: Reasonable Accommodation in Employment for Individuals With Disabilities

- C. "Employee" For purposes of this policy, the term "employee" means current employees and former employees eligible for Reassignment Program services.
- D. "Essential function" An essential function is a fundamental job duty of a position an employee must be able to perform, with or without reasonable accommodation.
- E. "Interactive process" The interactive process requires the employee, and the employer to communicate in good faith in a cooperative effort by all involved to identify limitations resulting from a disability, identify potential reasonable accommodations; and to facilitate the implementation of and/or cessation of reasonable accommodations.
- F. "Medical Separation"- A medical separation is an action taken by the County to separate an employee from employment due to a disability that prevents an employee from performing one or more essential functions of his or her job, with or without reasonable accommodation.
- G. "Promotion"- A promotion is the movement of an employee from one position to a different position having a higher maximum salary; movement from a non-benefited to a benefited position; movement from a temporary to a regular or appointed position; or movement from part-time to full-time employment.
- H. "Qualified individual with a disability"- A qualified individual with a disability is an individual with a disability who satisfies the requisite skill, experience, education and other job-related requirements of the job such individual holds or desires, and who, with or without reasonable accommodation, can perform the essential functions of the job.
- "Reasonable accommodation"- A reasonable accommodation may include:
 - A modification or adjustment to the job application process that enables a qualified applicant with a disability to be considered for the position the qualified applicant desires;
 - 2. A modification or adjustment to the work environment and/or the manner under which a position is customarily performed that enables a qualified individual with a disability to perform the essential functions of the job;
 - 3. Reassignment.
- J. "Reassignment"- Reassignment means placement of a qualified employee with a disability into a vacant, non-promotional position because the employee can no longer perform one or more of the essential functions of his or her job with or without reasonable accommodation.
- K. "Reassignment Program Services"- Include the identification of reassignment opportunities and the facilitation of reassignment placements. These services are provided to employees who can no longer perform the essential functions of their King County job due to a disability but are able to work in another capacity.
- L. "Reassignment Program Participants"- Employees or former employees eligible for Reassignment Program Services.

Exhibit KC-2 PA93 3

Document Code No.: PER-22-4-3-EP

Title: Reasonable Accommodation in Employment for Individuals With Disabilities

Page 3 of 4

V. Policy

- King County is committed to providing equal employment opportunities for qualified individuals with disabilities.
- B. A qualified individual with a disability has the right to request a reasonable accommodation when applying for employment and during employment.
- C. King County will provide a reasonable accommodation to a qualified individual with a disability. King County may require the individual seeking reasonable accommodation to provide medical documentation of his or her disability by a qualified health care professional or obtain additional medical documentation from a different health care provider, or may request that the individual sign a medical release.
- D. King County is not required to eliminate one or more of the essential functions of a position as a reasonable accommodation.
- E. An employee who receives a medical separation due to a disability that prevents him or her from performing one or more of the essential functions of his or her job with or without reasonable accommodation is eligible for Reassignment Program services.



- G. Reassignment Program participants must meet the minimum qualifications of a particular position to be eligible for a job referral to that position. King County is not obligated to train Reassignment Program participants to become qualified for reassignment positions.
- H. Reassignment Program participants are only eligible for job referrals to non-promotional job vacancies within agencies covered by this policy. A Reassignment Program participant who is hired into a career services position pursuant to a job referral may serve a probationary period for that position consistent with KC Code 3.12.100.
- King County is not obligated to create vacant positions, waive job qualifications, or waive the probationary period for Reassignment Program participants.
- J. Employees who are terminated or resign in lieu of termination from King County employment for disciplinary reasons are not eligible for Reassignment Program services.
- K. Employees who engage in conduct which would otherwise disqualify the individual from county employment are not eligible for Reassignment Program services.
- L. If an employee rejects a reasonable accommodation that is necessary to enable the employee to perform the essential functions of the position, and cannot, as a result of that rejection, perform the essential functions of the position, the employee will not be considered qualified.

Exhibit KC-2 PAGE 4

Document Code No.: PER-22-4-3-EP
Title: Reasonable Accommodation in Employment for Individuals With Disabilities

- M. Reasonable accommodation items that are purchased by King County are the property of King County.
- N. Employees who are temporarily unable to perform the essential functions of their positions due to medical restrictions that cannot be reasonably accommodated may be eligible for Transitional Duty as outlined in King County's policy entitled "Transitional Duty for Employees with Temporary Medical Restrictions."
- O. All agencies affected by this policy are responsible for coordinating with the Disability Services Program to ensure compliance with the policies and procedures, their dissemination, and any necessary training related to them.
- P. The respective agencies' supervisors, managers, and Human Resources Service Delivery Managers, and the Human Resources Division Director are responsible for administering any complaints that are filed with them related to these policies and procedures.

VI. Implementation Plan

- A. This policy becomes effective for Executive Branch departments and agencies on the date that it is signed. The Human Resources Division's Disability Services Program is responsible for implementation of this policy.
- B. The Human Resources Division's Disability Services Program is responsible for communicating this policy to covered departments and agencies.

VII. Maintenance

- A. This policy will be maintained by the Human Resources Division, or its successor agency.
- B. This policy will automatically expire five (5) years after its effective date. A new, revised, or renewed policy will be initiated by the Human Resources Division, or its successor agency prior to the expiration date

VIII. Consequences for Noncompliance

The Director of the Human Resources Division in the Department of Executive Services, or his or her designee, shall make all final determinations related to consequences for noncompliance with this policy.

King County does not tolerate discrimination, harassment, or retaliation on the basis of disability and such actions are misconduct in violation of these policies and procedures and King County's Nondiscrimination and Prohibition Against Retaliation Policy and Procedures.

Appendices:

None

AEDIN QUINN - FILING PRO SE

September 18, 2025 - 9:57 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_20250918095647SC905231_7036.pdf

This File Contains: Petition for Review

The Original File Name was Signed Supreme Court Motion To Supplement 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 20250918095647SC905231