

BY SARAH R. PENDLETON [REDACTED] JUDGE, COURT OF THE STATE OF WASHINGTON

Because the statutory prerequisite was abandoned, no tribunal ever acquired jurisdiction to adjudicate employability or terminate time-loss benefits. All subsequent proceedings, including the July 7, 2023 denial, rest on this void foundation and are themselves void ab initio.

### Relief Requested

Petitioner respectfully requests that this Court:

1. Declare that King County's failure to transmit a completed Job Analysis to Dr. Cooley constituted statutory abandonment under RCW 51.32.099 and RCW 51.36.010(2)(a);
2. Hold that such abandonment deprived all subsequent proceedings of jurisdiction; and
3. Void the July 7, 2023 denial order and enforce Petitioner's pension entitlement retroactive to April 14, 2019, the date of Dr. Cooley's Exhibit 57C "Not Fit To Return" report.

Respectfully submitted,

DATED: September 30, 2025

/s/ Aedin Quinn

Aedin Quinn, Pro Se | Petitioner / Plaintiff

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

U.S. District Court Case No. 2:25-cv-01356-JNW

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

[IN THE SUPREME COURT OF THE STATE OF WASHINGTON]

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

and

[IN THE UNITED STATES DISTRICT COURT]

Western District of Washington

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

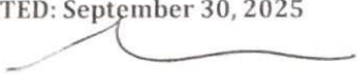
DECLARATION OF AEDIN QUINN REGARDING CHAIN OF CUSTODY OF JOB ANALYSIS FORMS

I, Aedin Quinn, declare as follows:

1. I am the Petitioner in this matter. I make this declaration based on my own personal knowledge.
2. I received from King County Human Resources a series of envelopes postmarked by the United States Postal Service in 2019, each sealed and addressed to me at my home address.
3. Upon opening these envelopes, I found enclosed only blank Job Analysis forms. No completed Job Analysis identifying an offered position, duties, or physical requirements was ever included.
4. I have preserved the original envelopes and their blank contents in their entirety. They remain unaltered from the condition in which they were delivered.
5. The USPS postmarks authenticate that the contents are exactly what King County mailed on those dates. The absence of any completed Job Analysis demonstrates that King County failed to comply with its statutory duty under RCW 51.32.099 and RCW 51.36.010(2)(a).
6. This record is objective proof of statutory abandonment: King County never even identified or transmitted a completed Job Analysis to the attending physician for review.

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

DATED: September 30, 2025

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

[IN THE SUPREME COURT OF THE STATE OF WASHINGTON]

Supreme Court No. 1043279 Superior Court No. 23-2-23850-8 Court of Appeals No.  
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and

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

AEDIN QUINN,

Petitioner / Plaintiff,

v.

KING COUNTY,

Respondent / Defendant.

**MOTION FOR LEAVE TO FILE PENSION DEMAND**

Petitioner respectfully moves for leave to file the attached Pension Demand

Following Statutory Abandonment. This filing is short, non-duplicative, and  
necessary to give effect to the Court's resolution of the jurisdictional defect raised in  
Petitioner's Emergency Motion for Stay & Order to Show Cause and Motion to Void  
Judgment.

Granting leave will ensure that, if statutory abandonment is confirmed, the Court has  
before it a clear request for immediate enforcement of Petitioner's vested pension  
entitlement.

DATED: September 30, 2025

/s/ Aedin Quinn

Aedin Quinn, Pro Se | Petitioner / Plaintiff

Supreme Court No. 1043279 | Superior Court No. 23-2-23850-8 | Court of Appeals No.  
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Case No. 2:25-cv-01356-JNW

AEDIN QUINN,

Petitioner / Plaintiff,

v.

KING COUNTY,

Respondent / Defendant.

#### PENSION DEMAND FOLLOWING STATUTORY ABANDONMENT

Tether Line:

Petitioner files this Demand to be considered together with the Emergency Motion for Temporary Stay & Order to Show Cause and the Motion to Void Judgment, so that—upon a finding of statutory abandonment/no jurisdiction—the Court may immediately enforce Petitioner’s vested pension entitlement.

#### Background

Washington statutes (RCW 51.32.099 and RCW 51.36.010(2)(a)) require an employer to prepare and transmit a completed Job Analysis to the attending physician before employability or pension may be adjudicated. King County never performed this duty. Instead, Petitioner preserved original postmarked envelopes containing only blank Job Analysis forms. This constitutes statutory abandonment at step one.

#### Legal Effect

Because the statutory prerequisite was abandoned, no tribunal ever acquired jurisdiction. All subsequent proceedings, including the July 7, 2023 denial, are void ab initio.

Meanwhile, incapacity was formally established by Dr. Cooley’s April 14, 2019 Exhibit 57C “Not Fit To Return” report. That finding has been corroborated by:

- Grady Exhibit 11 (2020): radiculopathy and trauma-linked L3–L5 findings,
- Penn Medicine Exhibit 8T (Feb. 6, 2025): severe spinal stenosis diagnosis, and
- Dr. Nwosu’s April 15, 2025 surgical plan (Exhibit 8N): permanent hardware implantation.

This chain of evidence confirms that incapacity and pension entitlement vested no later than 2019. Under controlling authority (*Leeper v. Dep’t of Labor & Indus.*, 123 Wn.2d 803 (1994)), once incapacity is established, permanent disability benefits cannot be withheld.

Petitioner further notes that the unlawful withholding of his vested pension has

deprived him of the ability to retain counsel to prosecute related civil fraud claims in Georgia. Pension benefits serve not only as wage replacement but as the means by which an injured worker can maintain access to justice. By abandoning its statutory duty to complete and transmit a Job Analysis, Respondent's actions forced Petitioner into financial deprivation so severe that he has been unable to secure counsel to address contractor theft and fraud. This demonstrates the cascading prejudice caused by Respondent's abandonment and underscores the urgency of immediate pension enforcement.

#### Relief Requested

Petitioner respectfully requests that this Court:

1. Recognize that pension entitlement vested in 2019;
2. Declare all contrary proceedings void ab initio for lack of jurisdiction; and
3. Order immediate enforcement of Petitioner's pension benefits retroactive to April 14, 2019.

Respectfully submitted,

DATED: September 30, 2025

  
/s/ Aedin Quinn

Aedin Quinn, Pro Se | Petitioner / Plaintiff

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

U.S. District Court Case No. 2:25-cv-01356-JNW

1054 Glenwood Avenue SE | Atlanta, GA 30316 | Phone: 404-992-1235 | Email:

aedinquinn@gmail.com

PROPOSED] ORDER VOIDING JUDGMENT FOR STATUTORY ABANDONMENT  
IN THE SUPREME COURT OF THE STATE OF WASHINGTON

Supreme Court No. 1043279

Court of Appeals No. 863894

Superior Court No. 23-2-23850-8

and

IN THE UNITED STATES DISTRICT COURT

Western District of Washington

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

AEDIN QUINN,

Petitioner / Plaintiff,

v.

KING COUNTY,

Respondent / Defendant.

This matter comes before the Court on Petitioner's Motion to Void Judgment for Statutory Abandonment. The Court, having reviewed the Motion, supporting evidence, and the record, and finding good cause, hereby ORDERS as follows:

1. The Court finds that Respondent King County failed to comply with the statutory prerequisite under RCW 51.32.099 and RCW 51.36.010(2)(a) by never transmitting a completed Job Analysis to the attending physician for review.
2. The Court further finds that Petitioner has preserved original blank Job Analysis forms and postmarked envelopes showing that no such transmission occurred, which constitutes abandonment of Respondent's statutory duty at step one of the process.
3. Because jurisdiction never attached, the July 7, 2023 denial order is VOID ab initio, and all subsequent proceedings premised on that denial are without legal effect.
4. Petitioner's pension entitlement is hereby ENFORCED retroactive to April 14, 2019, the date of Dr. Cooley's Exhibit 57C "Not Fit To Return" report, consistent with *Leeper v. Dep't of Labor & Indus.*, 123 Wn.2d 803 (1994).

IT IS SO ORDERED.

DATED: September 30, 2025

---

Judge / Justice of the Court

[[IN THE SUPREME COURT OF THE STATE OF WASHINGTON]

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

and

[IN THE UNITED STATES DISTRICT COURT]

Western District of Washington

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

AEDIN QUINN,

Petitioner / Plaintiff,

v.

KING COUNTY,

Respondent / Defendant.

#### CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2025, I served a true and correct copy of the following documents on Respondent King County's counsel by [☒ mail / ☒ email / ☒ e-file portal — select as applicable], pursuant to court rules:

1. Motion to Void Judgment for Statutory Abandonment
2. Motion for Leave to Supplement
3. Pension Demand Following Statutory Abandonment

DATED: September 30, 2025

/s/ Aedin Quinn

Aedin Quinn, Pro Se

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



# 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

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Patient:	AEDIN QUINN	DOB:	[REDACTED]
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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.

Paraspinal/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:

Exhibit 8N

Kenneth Nwosu, MD

*This has been electronically signed by Kenneth Nwosu, MD on 04-15-2025.*

**Addendum:** This patient continues to have sx and signs of L3-L4 and L4-L5 facet mediated low back pain supported by clinical presentation and hx of L2, L3, L4 MBB with diagnostic relief and subsequent RFA that was efficacious but has since waned. He also has sx and signs of right lumbar radiculopathy supported by R L3-L4 and L5-S1 foraminal stenosis, and neurogenic claudication supported by severe L3-L4 and L4-L5 spinal stenosis. His sx are not responsive to extensive conservative treatment thus far and are significantly impairing his qol and adl's. She is a candidate for surgery. I had a long discussion with him about the r/b/a to surgery and have recommended L3-L5 lateral lumbar interbody fusion (stage I), and subsequent L3-L5 PSF with possible L3-L5 laminectomy and right L5-S1 laminoforaminotomy (stage II). He endorses understanding and would like to consider his options before making a decision.

Modified By: Kenneth Nwosu, MD 2025.06.03 06:34.42

Exhibit 8T

Page 1 of 1

Name: Aedin Quinn | DOB: [REDACTED] | MRN: [REDACTED] | PCP: NO PCP | Legal Name: Aedin Quinn



Penn Medicine

Department of Rehabilitation Medicine

Penn Medicine at Rittenhouse

2/12/2025

Aedin Quinn  
1054 Glenwood Ave Se  
Atlanta GA 30316-1845  
DOB: [REDACTED]

Show result comparison

**Results History**

MR LUMBAR SPINE WO IV CONTRAST ORTHO (Order 963976786)  
2/6/2025 5:36 PM - Pennchart, Radiant Inresults

**Narrative & Impression**

UNIVERSITY OF PENNSYLVANIA  
Department of Radiology

MRI OF THE LUMBAR SPINE WITHOUT CONTRAST

CLINICAL INFORMATION: Back pain

COMPARISON: None.

PROCEDURE:

CONTRAST: None

FINDINGS:

Bones: No fractures, spondylolysis or aggressive lesions. Fatty endplate change at L5 inferior endplate.

Conus: Normal in caliber and signal. The conus terminates at L1

Paravertebral and limited retroperitoneal soft tissues: No abnormalities identified.

Congenitally small spinal canal.

At L1-2,

Disc: No substantial disc bulge

Facet arthropathy/ligamentum flavum: None



Spinal canal stenosis: None  
Neural foraminal stenosis: None

At L2-3,

Disc: No substantial disc bulge  
Facet arthropathy/ligamentum flavum: Mild  
Spinal canal stenosis: None  
Neural foraminal stenosis: None

At L3-4,

Disc: Circumferential disc bulge.  
Facet arthropathy/ligamentum flavum: Moderate  
Spinal canal stenosis: Moderate  
Neural foraminal stenosis: Mild right and minimal left

At L4-5,

Disc: circumferential disc bulge  
Facet arthropathy/ligamentum flavum: Severe  
Spinal canal stenosis: severe  
Neural foraminal stenosis: Mild left and minimal right

At L5-S1,

Disc: Circumferential disc bulge  
Facet arthropathy/ligamentum flavum: Mild to moderate  
Spinal canal stenosis: None  
Neural foraminal stenosis: Mild right

This report assumes that there are 5 non-rib bearing lumbar vertebral bodies with the L5 vertebral body articulating with the sacrum. Accurate numbering of the spine levels would require imaging of the thoracolumbar spine to count ribs.

#### IMPRESSION:

Congenitally small spinal canal with moderate spinal canal stenosis at L3/L4 and severe spinal canal stenosis at L4/L5.

Mild lower lumbar neural foraminal stenosis as described above.

Moderate to severe facet arthropathy most pronounced at L4/L5.

- SEVERE SPINAL CANAL STENOSIS - THE SPACE SURROUNDING THE SPINAL CORD BECOMES NARROWED SIGNIFICANT ENOUGH TO COMPRESS THE SPINAL CORD OR NERVE ROOTS
- Trauma
  - Difficulty walking, standing for long periods
- 2/6/2025 5:35 PM - Battle, Juan C, MD

You do not have security to view a non-public result.

2/6/2025 1:28 PM - Chilton, Heather

You do not have security to view a non-public result.





Exhibit 11

1 of 3

## MRI LUMBAR SPINE W WO CONTRAST

Collected on January 27, 2020 9:39 AM

Haytham Alrayah Hussein 02/26/2020, 6:37 PM

Please inform patient that MRI of the lumbar spine showed osteoarthritis, please asked patient to continue to follow-up with pain management clinic and orthopedics

### Results

#### Impression

##### IMPRESSION:

1. Edema and inflammatory enhancement centered within the periarticular soft tissues at L3-L4 and L4-L5 facet joints with edema in the pars interarticularis of L4 and L5 representing acute active degeneration related to facet arthropathy and possible mechanical stress.
2. Findings superimposed on multilevel degenerative changes of the lumbar spine with up to severe thecal sac narrowing at L4-L5 and moderate neural foraminal narrowing at L4-L5 and L5-S1 as detailed above.

The images were reviewed and interpreted by Ryan Peterson, MD.

#### Narrative

EXAM: MRI LUMBAR SPINE W WO CONTRAST

CLINICAL INDICATION: Back pain or radiculopathy, > 6 wks.

TECHNIQUE: Pre-contrast sagittal T1-, T2-, and T2-w fat-saturated images, and axial T1- and T2-w images of the lumbar spine. Post-contrast axial T1-w and sagittal T1-w fat-saturated images. Intravenous contrast material was administered for the examination.

COMPARISON: Lumbar spine radiograph 10/23/2019.

#### FINDINGS:

Spine Numbering: For purposes of this dictation, it is assumed that there are 5 non-rib-bearing, lumbar-type vertebrae, and the most caudal fully segmented lumbar vertebra is labeled L5.

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

Title: Reasonable Accommodation in Employment for Individuals with Disabilities

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 Resources Division

Executive signature: *Therese Berry*

Date signed and effective: 3-3-14



**King County**

**I. 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.

**II. 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.

- A. "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.

- 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.
- I. "Reasonable accommodation" - A reasonable accommodation may include:
  - 1. 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.



V. Policy

- A. 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. 
- F. Employees must be medically released to work in some capacity to be 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.
- I. 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.



- 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

Exhibit KC-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: <a href="mailto:dennis_lock@kingcounty.gov">dennis_lock@kingcounty.gov</a>

☒ On-Site    ☐ Interview    ☐ Representative

### 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.

1. 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.
2. 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.
5. Interact appropriately with the public and co-workers in order to provide positive customer services and the safe transport of passengers.
6. 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.
8. 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).
9. 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



**King County**

Department of Transportation  
Metro Transit

[www.kingcounty.gov](http://www.kingcounty.gov)

July 15, 2019

Aedin Quinn  
3606 S. 180<sup>th</sup> 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 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-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](http://www.kingcounty.gov)

July 15, 2019

Aedin Quinn  
3606 S. 180<sup>th</sup> 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](mailto:sschmitz@kingcounty.gov).

Sincerely,

Sara M. Schmitz  
Transit Disability Services

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

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

July 15, 2019

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  
opelu8aflcio

**KEN PRICE**  
President  
Business Representative  
kprice.president@atu587.org

**RON ANDERSON**  
Vice President  
Assistant Business Representative  
randerson.vp1@atu587.org

**CORY RIGTRUP**  
Vice President Maintenance  
Assistant Business Representative  
crigtrup.vp2@atu587.org

**PATRICK BRADY**  
Financial Secretary  
Treasurer  
pbrady.fimsec@atu587.org

**TAMIEKO COOK**  
Recording Secretary  
Correspondent to In Transit  
tcook.recsec@atu587.org

Exhibit A

 King County  
**METRO**  
Transit Disability Services  
King Street Center  
KSC-TB-0235  
201 South Jackson Street  
Seattle, WA 98104

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

PRESORTED  
FIRST CLASS



1  
USPS METRO WITH ZIPWIS  
  
ZIP 98104 \$ 000.42<sup>1</sup>  
01/1/18 0000337232901 10 2018

9818834344 0045



EIRC

nsit Disability Services

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



ZIP 98104 \$ 002.35<sup>c</sup>  
02 4N  
0000337134 JUL 16 2011

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

Exhibit B

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



# AEDIN QUINN - FILING PRO SE

September 30, 2025 - 3:59 PM

## 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\_20250930155730SC922421\_6276.pdf  
This File Contains:  
Petition for Review  
*The Original File Name was Signed Motion To Void Judgement For Statutory Abandonment.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 20250930155730SC922421**

FILED  
SUPREME COURT  
STATE OF WASHINGTON  
9/30/2025 4:00 PM  
BY SARAH R. PENDLETON  
CLERK

Exhibit 57C

1 of 2

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  
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**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

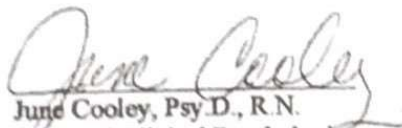
309.81 Posttraumatic Stress Disorder

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 30, 2025 - 4:00 PM

## 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\_20250930160008SC824813\_8800.pdf  
This File Contains:  
Petition for Review  
*The Original File Name was Dr Cooley Not Fit To Return Report.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 20250930160008SC824813**