

FILED
SUPREME COURT
STATE OF WASHINGTON
8/11/2025 1:41 PM
BY SARAH R. PENDLETON
CLERK

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

BARBARA SHULTZ, a single individual,)	Supreme Ct Case No. 1044283
Petitioner)	Appellate Court No. 59807-8-II
)	Superior Ct Case No.: 23-2-00265-06
v.		
)	
PEACE HEALTH/SOUTHWEST)	
WASHINGTON REGIONAL SURGERY)	MOTION TO REDACT
CENTER, a Washington company, and)	PERSONAL INFORMATION
DR. ALLEN GABRIEL, a single individual,)	
)	
Respondents)	

MOTION TO REDACT PERSONAL INFORMATION

Pursuant to **Washington State Court General Rule (GR) 15** and **GR 31(e)**, Plaintiff Barbara Shultz (“Plaintiff”) respectfully moves the Court to redact the following personal identifiers from the publicly available records in the above-referenced matter:

- Date of birth
- Case number (when not relevant to public version)
- Medical record number
- Chart number
- Insurance company information (including policy and identification numbers)
- Account number
- Spouse’s contact information (phone number, email address, and/or mailing address)

These details constitute personal identifiers that are not relevant to the legal or factual issues before the Court and pose significant privacy and security concerns if left publicly accessible.

In accordance with **GR 31(e)(1)**, this request is made to protect against the unnecessary disclosure of sensitive personal information. Redaction will not affect the substantive record of the case and will preserve the privacy interests of myself and my spouse.

DOCUMENTS AND PAGE NUMBERS FOR REDACTION

Document Title / Description	Page Number(s)	Item to be Redacted
Appendix – Medical Record Extracts	46	Date of birth, case number
Appendix – Medical Record Extracts	47, 48	Medical record number (top and bottom)
Appendix – Medical Record Extracts	49	Chart number, date of birth, insurance company name and ID number, account number, Eric Shultz’s information
Appendix – Medical Record Extracts	55	Date of birth (top and bottom), insurance company name, medical record number (bottom)
Appendix – Medical Record Extracts	56	Chart number
Appendix – Medical Record Extracts	57	Date of birth (bottom), phone number
Appendix – Medical Record Extracts	76	Date of birth (bottom), ID number (bottom)
Appendix – Medical Record Extracts	77	Medical record number (top), date of birth (top)
Appendix – Medical Record Extracts	78	Medical record number (top), date of birth (top)
Appendix – Settlement Communications	81	Settlement offer amount (\$15,000)

Because Plaintiff wishes to protect against the unnecessary disclosure of sensitive personal information, Plaintiff respectfully request that the Court grant this motion and direct the

Clerk to redact the above-listed information from all documents currently accessible to the public in this matter.

Respectfully submitted,

/s/
Barbara Shultz Pro Se

CERTIFICATION

Plaintiff hereby certifies under penalty of perjury that on August 11, 2025, I caused to be served a true and correct copy of the foregoing document on the below-listed attorney(s) of record:

LINDSAY HART, LLP
Jay W. Beattie, WSBA No. 37160
jbeattie@lindsayhart.com
Katie M. Eichner, WSBA No. 52979
keichner@lindsayhart.com
Melissa Bushnick, WSBA No. 56224
mbushnick@lindsayhart.com

/s/

Barbara Shultz, pro se

BARBARA SHULTZ - FILING PRO SE

August 11, 2025 - 1:41 PM

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: 104,428-3
Appellate Court Case Title: Barbara Shultz v. Peace Health, et al.
Superior Court Case Number: 23-2-00265-6

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_____/s/____

Barbara Shultz, pro se

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