Court of Appeals No. 39811-1-III

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

ERIC HOOD,
Respondent,

v.

STEVENS COUNTY,
Petitioner.

AMENDED PETITION FOR REVIEW

WILL M. FERGUSON
WSBA 40978
SPECIAL DEPUTY PROSECUTING ATTORNEY
STEVENS COUNTY
215 S. OAK STREET, ROOM 114
COLVILLE, WA 99114

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I. INTRODUCTION

This Court's recent Opinion in Cousins v. State should not be applied retroactively; Division III of the Court of Appeals applied it anyway. This Petition presents an opportunity to deconflict the Court of Appeals' Opinion with this Court's Opinion in Cousins.

II. IDENTITY OF PETITIONER

Respondent Stevens County (hereinafter the "County"), by and through the Stevens County Prosecuting Attorney, requests review of an Opinion of the Washington Court of Appeals.

III. STATEMENT OF THE CASE

On Friday, December 27, 2019, at 7:50 p.m., Mr. Eric Hood (hereinafter "Mr. Hood") submitted the first part of a request for records (hereinafter the "Request") under the Public Records Act,

RCW 42.56, et. seq. Clerk's Papers at page 82. The Request was divided into two parts. The salient portion of the first part sought records about an audit of the Town of Springdale, conducted by the Washington State Auditor. CP 82-83, 89-90. The next day, Mr. Hood sent the second part of his Request, setting a date range. CP 83, 92.

The Stevens County Prosecutor's Office acknowledged receipt of the Request on December 30, 2019, with the following message and singular production of records:

> Attached please find records related to Stevens County Sheriff's Office incident report no. 18000114 in response to your December 30, 2019 public records request. Additional time will be needed to search our records for any email correspondence regarding this case. I anticipate that such records will be available within 2-3 weeks. Should the records be available sooner, I will let you know.

CP 83, 94.

On January 6, 2020, Deputy Prosecutor Christina Radzimska (hereinafter "Deputy Prosecutor Radzimska") closed

the file and sent Mr. Hood the following note (hereinafter the "closing letter" or "closing e-mail"):

> We conducted a search of our email database with the following search terms: 1. Town of Springdale, 2. Springdale City Clerk/Treasurer, 3. Lisa Sheppard, 4. Springdale Audit.
>
> This search resulted in no responsive emails. **We believe this completes your request.**

CP 83, 96-98. Given that Deputy Prosecutor Radzimska discovered no further responsive records, the disclosure was not on an installment basis; there was only one batch of records and that batch was given over to Mr. Hood on December 30, 2019.

On January 6, 2020, at 10:30 a.m., Mr. Hood sent an e-mail, asking if Deputy Prosecutor Radzimska had checked any hardcopies. Mr. Hood stated:

> Thank you for your prompt response. Would you please check your hardcopy records or other locations? I understand that this was a fraud case against the town that was referred to your office by the state auditor. I would think that something of this importance would merit some kind of record.
> Eric Hood

CP 84, 100. Mr. Hood received no response. CP 84. Over a month later, Mr. Hood sent another plaintive e-mail on Friday, February 14, 2020, at 8:45 a.m.:

> Did you get my below email?
> Thanks
> Eric

CP 84, 102. Mr. Hood received no response for nearly a month. CP 84.

Over two months after the closing e-mail, Mr. Hood received the following e-mail from Ms. Sasha M. Blackman (hereinafter "Ms. Blackman"), who was Deputy Prosecutor Radzimska's paralegal/civil legal assistant:

> Dear Mr. Hood:
>
> Ms. Radzimska is no longer with our office. I am going thru her emails. What exactly was this regarding?
>
> Thank you!

CP 84, 104. At the time of the e-mail, Ms. Blackman was not the appointed Public Records Officer. CP 84. Her job title was disclosed by her salutation block. CP 84.

The next day, Mr. Hood sent the following response to Ms. Blackman's March 10 e-mail:

> Please see email chain. It's a records request.
> Eric

CP 84-85, 108. On March 16, 2020, Ms. Blackman sent the following e-mail to Mr. Hood:

> Dear Mr. Hood:
>
> Attached please find all the hard copies the Stevens County Prosecutor has regarding the Audit on the City of Springdale. You can also Search more State Auditor's Office documents online at https://www.sao.wa.gov/
>
> We believe this is responsive to your request.

CP 85, 110. There were three documents attached to the e-mail from Ms. Blackman. Two of the three documents were outside of the date range requested by Mr. Hood and one was a document that had been disclosed by Deputy Prosecutor Radzimska. CP 85, 110-23.

On March 10, 2021, one year and two months after the closing e-mail and more than one year and two months after the

only disclosure and production of responsive records, Mr. Hood filed his Complaint for Violations of the Public Records Act. CP 3-7. Stevens County filed its Answer & Affirmative Defenses on July 2, 2021 and asserted the time-barred nature of Mr. Hood's Complaint. CP 8, 11.

Stevens County moved for summary judgment. CP 13-14. After hearing argument and considering Stevens County's Motion and the filings of both Parties, the Spokane County Superior Court (hereinafter the "Superior Court") granted summary judgment in favor of the County. CP 301-03. Mr. Hood appealed.

IV. DECISION OF THE COURT OF APPEALS

On June 3, 2025, Division III of the Court of Appeals, in an unpublished opinion (hereinafter "Opinion"), reversed the Superior Court's grant of summary judgment. See **Appendix A**. The Court of Appeals held that the County's closing e-mail, which predated this Court's decision in Cousins, satisfied

Belenski—but not Cousins. Opinion at page 9. The Court of Appeals denied the County's Motion for Reconsideration on July 10, 2025. See **Appendix B**.

V. ISSUE PRESENTED FOR REVIEW

1. Should this Court accept review under RAP 13.4(b)(1) because the Court of Appeals' Opinion violated Cousins' bar against retroactive application?

VI. ARGUMENT WHY THIS COURT SHOULD GRANT REVIEW

1. The Court of Appeals' Opinion directly conflicts with Cousins and with this Court's body of caselaw regarding retroactivity.

The Court of Appeals' Opinion precisely fits the purpose of RAP 13.4(b)(1). The Court of Appeals' retroactive application of Cousins is in direct conflict with the letter and spirit of this Court's Opinion in Cousins.

The Court of Appeals should not have applied Cousins retroactively because not even the new standard of strict

compliance announced in that case applied to the closing letter in Cousins.

"DOC's June 2021 closing letter was similar to the January 2019 closing letter. Nevertheless, under the circumstances presented here, and in light of the fact that DOC did not yet have the guidance provided in today's opinion, **we conclude that the June 2021 closing letter was sufficient to satisfy Belenski's final, definitive response test.**" Cousins v. State, 3 Wash.3d 19, 55, 546 P.3d 415 (2024) (emphasis added) (internal citation omitted). The Court of Appeals retroactively applied a test that not even this Court applied to the facts of Cousins.

The analysis that this Court applied to the facts in Cousins was the standard announced in Belenski, not a new strict compliance rule: "We must decide whether Cousins' PRA action is barred by the one-year statute of limitations, RCW 42.56.550(6). The answer is no. In accordance with [Belenski], we hold that the limitations period did not start running until DOC issued its final 'closing letter' in June 2021." Id. at 21-22.

The Court of Appeals rejected the County's argument against retroactive application of Cousins:

> The County argues that *Cousins* is intended to provide guidance for future PRA closing letters and warned against retroactive application….However, nowhere in the opinion does the court claim that the test or guidance outlined in the opinion was not intended to apply retroactively to PRA cases. As such, the County's argument fails.

Opinion at page 9.

The Court of Appeals was incorrect. This Court carved out an exception against retroactive application of strict compliance:

> As discussed, the sufficiency of a closing letter should be assessed in accordance with the guidance provided by today's opinion and the attorney general's Advisory Model Rules. Of course, today's opinion was not available to DOC while it was processing Cousins' PRA request. Therefore, it is not surprising that neither of the closing letters DOC sent to Cousins in January 2019 and June 2021 strictly complies with the standards set forth in today's opinion. **However, this fact is not determinative, as we do not claim to impose a retroactive standard of strict compliance**.

Cousins, 3 Wash.3d at 52 (emphasis added). "Indeed, such an

approach would be entirely inconsistent with the balanced, functional approach taken by our precedent, as discussed above." Id. (emphasis added). "Our decisions of law apply retroactively to all litigants not barred by procedural requirements **unless** we expressly limit our decision to purely prospective application." Lunsford v. Saberhagen Holdings, Inc., 166 Wash.2d 264, 285, 208 P.3d 1092, 1103 (2009) (emphasis added).

The County's closing e-mail in this case satisfied Belenski. In fact, the Court of Appeals found no fault with the Superior Court's grant of summary judgment under the law that applied at the time:

> **While the trial court did not have the benefit of our Supreme Court's decision in Cousins, and we therefore do not fault it**, we nonetheless hold that Cousins applies to this case and requires reversal of the order dismissing Hood's complaint on summary judgment.

Opinion at page 9 (emphasis added).

The Court of Appeals concluded that while this Court did not intend to impose a retroactive rule of strict compliance, it

meant to impose a retroactive rationale. Opinion at page 9 ("…nowhere in the [Cousins] opinion does the court claim that the test or guidance outlined in the opinion was not intended to apply retroactively to PRA cases."). Setting aside the inherently contradictory nature of that holding and the clear error in light of the explicit statement in Cousins, there is nothing in the Cousins decision that would permit such an interpretation. The caselaw of retroactivity does not split hairs between rules and rationales.

Mr. Hood may contend that the Court of Appeals' application of Cousins was not retroactive because Mr. Hood's case was pending on appeal. But such contention would miss the purpose of the guidance from this Court. This Court's guidance was meant to apply to future closing letters; that is, closing letters written after this Court handed down Cousins.

Neither the County nor the Superior Court had the benefit of Cousins at the time of the closing letter or summary judgment. The Court of Appeals' Opinion is therefore neither helpful nor correct.

The County and Superior Court in this Case are no different from DOC and the Thurston County Superior Court in Cousins. The County and the Superior Court can no more rewind time and utilize this Court's guidance anymore than DOC and the Thurston County Superior Court could have done so in Cousins. The retroactive application of Cousins serves no purpose and is in direct conflict with the spirit and letter of this Court's decision.

VII. CONCLUSION

This Court barred retroactive application of Cousins to closing letters in Public Records Act cases, but the Court of Appeals applied it anyway. This Court should accept review under RAP 13.4(b)(1).

I certify that the number of words in this Document, excluding this Certificate and other portions of this Document

exempt from the word count, according to Microsoft Word, is 1,824 and is therefore within the word count permitted by WA RAP 18.17.

RESPECTFULLY SUBMITTED 11th day of August, 2025.

Will Ferguson, WSBA 40978
Special Deputy Prosecuting Attorney
Office of the Stevens County Prosecuting Attorney
Attorney for Petitioner

CERTIFICATE OF SERVICE

I certify that on the 11th day of August, 2025, I caused a copy of the foregoing document to be served via e-mail upon

uploading the same to the Washington Courts web portal, to the following parties or their attorney(s):

William Crittenden
Attorney for Respondent
bill@billcrittenden.com

Will Ferguson, 40978

APPENDIX "A": Unpublished Opinion in Hood v. Stevens County, no. 39811-1-III, filed June 3, 2025

FILED
JUNE 3, 2025
In the Office of the Clerk of Court
WA State Court of Appeals, Division III

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON

DIVISION THREE

ERIC HOOD, Appellant, v. STEVENS COUNTY, Respondent.	)	No. 39811-1-III UNPUBLISHED OPINION

STAAB, A.C.J. — The trial court granted Stevens County's motion for summary judgment, finding that Eric Hood filed his complaint outside the one-year limitations period for violations of the Public Records Act (PRA), ch. 42.56 RCW. Specifically, the court found that an email sent to Hood by the County, reading "we believe this completes your request," triggered the commencement of the limitations period.

After the superior court dismissed Hood's complaint, and while his appeal was pending, our Supreme Court issued its opinion in *Cousins v. State*, 3 Wn.3d 19, 546 P.3d 415 (2024), setting forth a three-part test to determine whether a closing letter is a final, definitive response for the purpose of triggering the statute of limitations. Here, the email sent from the County only satisfied one of the three inquiries. As such, the email was not

a final definitive response that triggered the one-year statute of limitations and the court thus erred when it granted the County's motion for summary judgment.

BACKGROUND

On December 27, 2019, Eric Hood emailed a PRA request to Stevens County. Hood's request pertained to a recent audit:

> Please give me all the records related to the audit. That would include communications between the Stevens County prosecutor's office and the town, and any discussions among town officials and employees about the audit. Please send them to me electronically or let me know and I can share a dropbox with you.

Clerk's Papers (CP) at 4. The next day, Hood sent another email to the County stating: "[t]he time range for this request is from the date the Town of Springdale first contacted your office regarding the audit up to and including March 8, 2018." CP at 4. The County acknowledged receipt of this request two days later on December 30, 2019, with the following response:

> Attached please find records related to Stevens County Sheriff's Office incident report no. 1800114 in response to your December 30, 2019 public records request. Additional time will be needed to search our records for any email correspondence regarding this case. I anticipate that such records will be available within 2-3 weeks. Should the records be available sooner, I will let you know.

CP at 94.

On January 6, 2020, Hood received an email from Deputy Prosecuting Attorney, Christina Radzimska, which read:

> We conducted a search of our email database with the following search terms:
>
> 1. Town of Springdale
>
> 2. Springdale City Clerk/Treasurer
>
> 3. Lisa Sheppard
>
> 4. Springdale Audit
>
> This search resulted in no responsive emails. We believe this completes your request.

CP at 170. After sending this email, Radzimska closed the file. Later that day, Hood responded to the email and asked if Radzimska could check for hardcopies or other locations. After Hood did not hear back from her, he sent another email and asked whether the County received his prior email.

On March 10, 2020, Hood received an email from Sasha Blackman, Radzimska's paralegal, who informed Hood that Radzimska no longer worked in their office. She asked Hood to clarify what his email was regarding. Hood informed her that it was a records request and asked her to refer to the email chain. On March 16, 2020, Hood received an email from Blackman containing three responsive records as attachments that stated: "Attached please find all the hard copies the Stevens County Prosecutor has regarding the Audit on the City of Springdale. You can also Search more State Auditor's Office documents online." CP at 85.

The following year, on March 10, 2021, Hood served his summons and complaint on the County. The County moved for summary judgment, alleging that Hood's complaint was filed more than one year after Radzimska's January 6, 2020 closing email. Hood responded, arguing that the email was not definitive and did not put him on notice that his PRA request was actually closed, and that the County released additional records on March 16, 2020, which was within one year of Hood commencing this case. The trial court agreed with the County and granted its motion for summary judgment.

Hood appeals.

ANALYSIS

1. TRIGGERING EVENT FOR STATUTE OF LIMITATIONS

Hood contends the trial court erred by concluding that the County's email was a final, definitive response to Hood's request for public records that triggered the one-year statute of limitations outlined in RCW 42.56.550(6).

This court reviews orders on summary judgment de novo. *Anderson v. Grant County*, 28 Wn. App. 2d 796, 803, 539 P.3d 40 (2023); *Keck v. Collins*, 184 Wn.2d 358, 370, 357 P.3d 1080 (2015). In deciding a motion for summary judgment, the court "must consider the evidence and all reasonable inferences from the evidence in the light most favorable to the nonmoving party." *Anderson*, 28 Wn. App. 2d at 803. Summary judgment is only appropriate if "there are no genuine issues of material fact and the

moving party is entitled to judgment as a matter of law." *Id.* This court "may affirm summary judgment on any basis supported by the record." *Id.*

Under the PRA, actions "must be filed within one year of the agency's claim of exemption or the last production of a record on a partial or installment basis." RCW 42.56.550(6). The Washington State Supreme Court recently interpreted this statute and, as a matter of first impression, determined whether "an agency's 'closing letter' may trigger the PRA's limitations period." *Cousins*, 3 Wn.3d at 36.

In *Cousins*, the court held that a sufficient closing letter "will generally trigger the PRA's statute of limitations" and that subsequently producing records may be relevant for the purpose of determining penalties or liability but "ordinarily will not restart the limitations period." *Id.* However, the "closing letter must be *sufficient*; an agency's use of the word 'closed,' without more, is not determinative." *Id.* The court reiterated that a closing letter must satisfy the "final, definitive response test" first discussed in *Belenski v. Jefferson County*, 186 Wn.2d 452, 378 P.3d 176 (2016), in accordance with the "attorney general's Advisory Model Rules [AMR] and the guidance provided in [the *Cousin*'s] opinion." *Cousins*, 3 Wn.3d at 36.

The court went on to explain what makes a closing letter sufficient. *Id.* In particular, the closing letter must provide the following information to the requestor:

> (1) how the PRA request was fulfilled and why the agency is now closing the request, (2) that the PRA's one-year statute of limitations to seek judicial review has started to run because the agency does not intend to

> further address the request, and (3) that the requester may ask follow-up questions within a reasonable time frame, which may be specified by the agency.

Id. at 36-37. Additionally, the court explained that an agency is not required to search for additional records if the requestor asks a follow-up question, but if the agency does not intend to further address the request, "it must explicitly say so and reiterate that the statute of limitations has started to run." *Id.* at 37. This is because "[t]he final, definitive response test is an objective inquiry, so the agency's subjective intent . . . [is] not relevant." *Id.*

Cousins also provided a thorough overview of the one-year PRA statute of limitations precedent. *Id.* at 37-38. It explained that *Belenski* provides "the correct analytical framework for all PRA cases" and it also largely "affirm[ed] *Dotson*'s application of *Belenski* to the [specific] closing letter in that case." *Id.* at 38. However, the court declined to adopt or recognize "a bright-line rule that *Belenski* is necessarily satisfied by the word 'closed.'" *Id.* Instead, the closing letter will trigger the PRA's limitation period only if "the letter satisfies the final, definitive response test in accordance with the attorney general's [AMR] and the guidance provided in [this] opinion." *Id.* Importantly, *Cousins* noted that its opinion does not "claim to impose a retroactive standard of *strict* compliance." *Id.* at 52 (emphasis added).

As discussed in *Cousins*, the attorney general's AMR provides that a request "'can be closed' by an agency only when the request 'has been fulfilled.'" 3 Wn.3d at 47 (quoting WAC 44-14-04006(1)). Fulfillment can occur in several ways:

> [W]hen a requestor has inspected all the requested records, all copies have been provided, a web link has been provided (with assistance from the agency in finding it, if necessary), an entirely unclear request has not been clarified, a request or installment has not been claimed or reviewed, or the requestor cancels the request.

WAC 44-14-04006(1).

When a request has been fulfilled, the agency should provide the requestor with a "closing letter stating the scope of the request and memorializing the outcome," which should include an explanation on how the request was fulfilled. WAC 44-14-04006(1). Additionally, the closing letter "should also ask the requestor to promptly contact the agency if [they] believe[ ] additional responsive records have not been provided." WAC 44-14-04006(1). When the closing process has been completed, an agency no longer has an obligation to search for records. WAC 44-14-04007.

Having reviewed the principles established in *Cousins* and the AMR, we must now address whether the "closing letter" sent on January 6, 2020, was sufficient to trigger the PRA's one-year statute of limitations as the County contends.

First, although the email does indicate how the PRA request was fulfilled—because no responsive records were found—and why Hood's request was being closed—because the County believed this fulfilled his request—it fails the second and third

requirements outlined in *Cousins*. The letter did not indicate that the statute of limitations had begun to run or that the agency would not address the request any further and it failed to inform Hood that he may ask follow-up questions within a reasonable timeframe. Although *Cousins* clarifies that strict compliance is not required, two of the three requirements were not fulfilled and thus the email would not put a reasonable lay person on notice. *See Cousins*, 3 Wn.3d at 53 ("[T]he sufficiency of a closing letter must be considered objectively, applying the standard of a reasonable lay person.").

The County contends that because it did not respond to Hood's January 6 email asking if the County was sure there were no responsive records, that should have reinforced to Hood that the request was closed. This argument fails. As discussed, *Cousins* establishes that a requestor is allowed to ask follow-up questions, but if the agency does not intend to further address the request, "it must *explicitly say so* and reiterate that the statute of limitations has started to run." *Id.* at 37 (emphasis added). As such, failing to respond to Hood's question was not sufficient, the County needed to explicitly communicate to Hood that it did not intend to further address the request and that the statute of limitations started to run.

The County cites *Dotson v. Pierce County*, 13 Wn. App. 2d 455, 464 P.3d 563 (2020) to support the argument that the later production of records does not extend the date for calculating the statute of limitations. However, contrary to the case at hand, in *Dotson*, the first letter sent to the requestor was sufficient to constitute a final, definitive

response. *Id.* at 471-72. Despite the fact the County later reopened the request and produced more documents, because the first email satisfied the final, definitive response test, the statute of limitations was not tolled simply by reopening the claim and producing more documents. *Id.* at 470. *Dotson* is thus unhelpful for the County's argument because the initial email sent on January 6, 2020, did not satisfy the final, definitive response test.

The County argues that *Cousins* is intended to provide guidance for future PRA closing letters and warned against retroactive application. The County misconstrues the language in *Cousins*. "Washington has followed the general rule that a new decision of law applies retroactively unless expressly stated otherwise in the case announcing the new rule of law." *Lunsford v. Saberhagen Holdings, Inc.* 166 Wn.2d 264, 271, 208 P.3d 1092 (2009). *Cousins* stated that it did "not claim to impose a retroactive standard of strict compliance." 3 Wn.3d at 52. However, nowhere in the opinion does the court claim that the test or guidance outlined in the opinion was not intended to apply retroactively to PRA cases. As such, the County's argument fails.

While the trial court did not have the benefit of our Supreme Court's decision in *Cousins*, and we therefore do not fault it, we nonetheless hold that *Cousins* applies to this case and requires reversal of the order dismissing Hood's complaint on summary judgment.

2. ATTORNEY FEES ON APPEAL

Hood requests attorney fees on appeal should he prevail, pursuant to RCW 42.56.550(4) and RAP 18.1(a). The County contends that Hood would need to secure reversal from this court to receive attorney fees and that Hood should not be the prevailing party. We conclude that Hood prevailed on appeal and is entitled to attorney fees.

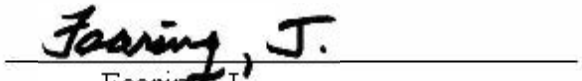
The PRA provides that "[a]ny person who prevails against an agency in any action in the courts seeking the right to inspect or copy any public record or the right to receive a response to a public record request" "shall be awarded all costs, including reasonable attorney fees." RCW 42.56.550(4). "This includes attorney fees incurred on appeal." *Dotson*, 13 Wn. App. 2d at 473. Likewise, under RAP 18.1(a), we may award attorney fees to the prevailing party on appeal if applicable law grants a party the right to recover those fees and if the party requests them as prescribed by RAP 18.1. *Wachovia SBA Lending, Inc. v. Kraft*, 165 Wn.2d 481, 493, 200 P.3d 683 (2009). Here, Hood has prevailed against the County in a PRA action on appeal and has cited appropriate authority. As such, we should award Hood his reasonable attorney fees on appeal as the prevailing party.

Reversed and remanded for further proceedings.

A majority of the panel has determined this opinion will not be printed in the Washington Appellate Reports, but it will be filed for public record pursuant to RCW 2.06.040.

Staab, A.C.J.

WE CONCUR:



Fearing, J.

Murphy, J.

APPENDIX "B": Order Denying Motion for Reconsideration

COURT OF APPEALS, DIVISION III, STATE OF WASHINGTON

ERIC HOOD, Appellant, v. STEVENS COUNTY, Respondent.	)	No. 39811-1-III ORDER DENYING MOTION FOR RECONSIDERATION

THE COURT has considered respondent's motion for reconsideration and is of the opinion the motion should be denied. Therefore,

IT IS ORDERED, the motion for reconsideration of this court's decision of June 3, 2025 is hereby denied.

PANEL: Judges Staab, Fearing, Murphy

FOR THE COURT:

Lawrence-Berrey, C.J.

ROBERT LAWRENCE-BERREY
Chief Judge

August 11, 2025 - 2:27 PM

Transmittal Information

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