

Court of Appeals No: 29927-9-III

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COURT OF APPEALS
DIVISION III
STATE OF WASHINGTON
By

**THE COURT OF APPEALS
OF THE STATE OF WASHINGTON
DIVISION III**

JANE M. HESSION

Respondent

v

TARI JANE ANDERSON

Appellant

REPLY BRIEF OF APPELLANT

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INTRODUCTION

The action in this case is a significant legal concept of a Tort Law motivated by the concern, about freedom from unwanted intrusion into one's "personal space" in the exercise of the United States Constitution First Amendment Rights, Article 1 Section 3 and the premise of the Washington State Constitution, Article I Section 4 and the Washington State Laws. In the process of obtaining justice, Tari Jane Anderson has met several judicial injustices and numerous miscarriages of justice to the extent, that the violations of the Fourteenth Amendment and the Fifth Amendment, Due Process of Law were affected. The unlawful abridgement of the law were done on the basis of 'profile status', between the pro se litigant and the appointed mayor's wife, Jane M. Hession, the tortfeasor. In addition, the inexcusable act to withhold information was an oversight by the Superior Court as a means to keep legal changes of the case at bay, not just in the 'Notice of Oral Hearing' which was altered as a Trial de Novo without written notice, but given in a manner as not to inform the appellant prior to the trial on December 6, 2010 of the judicial process. The protection of the appellant's 'substantive and 'fundamental rights' bestowed on all American citizens was not addressed as a fair and just assessment which continues on throughout this case.

The lower court judge not only abused the 'Procedural Rules of Small Claims Court'; but disavowed evidences presented on the 'Intentional Tort of Simple Battery' or deem necessary as a 'Negligence Act'. The legal elements of the law were inclusively ignored and overlooked not only in the lower court, but within the Superior Court that did not view the DVD, because the Superior Court's Administrative Assistant in Stevens County, Evelyn Bell forgot to arrange the viewing equipment (unlike Small Claims Court) that speaks volume to establish the ends of justice.

ARGUMENT

A. The application of existing laws was erred on the ‘Procedural Rules of Small Claims’. In doing so, the scope of proceedings evolved as an abuse of discretion by the lower court’s rationale which gave rise to an appeal for a fresh look noted by the Superior Court’s own rationale not as a matter of right, but as a discretionary review.¹

This statute of RCW 12.40.080 “No Attorney-at Law”² has been the focus of a violation that pertains to Counsel, Dennis P. Hession entering the judicial forum of Small Claims Court³ with the concept of ‘marital community’⁴ even though the lawsuit was solely against Jane M. Hession, the tortfeasor⁵. What the lower court has done in the process of establishing justice, misinterpreted the law which evolved as an ‘abuse of discretion’, by allowing Counsel, Dennis P. Hession to defend his wife in Small Claims Court. This professional abuse of conduct was an unethical approach in this jurisdiction. The legal concept was not merely to assist Jane M. Hession in the trial to a certain degree, but counsel deliberately abused the judiciary system throughout the entire scope of proceedings as he answered for his wife and performed as an attorney in the art of defense. Small Claims Court is a (“Peoples’ Court”) and not described as the District Court by the implication in the

¹ Superior Court ‘Verbatim Report of Proceedings’ on p.45, on December 6, 2010.

² Appendix

³ CP 21 or RP: 15 to 16:10 (March 12, 2010)

⁴ CP 21 or RP:19:20:10 and CP 50 (RP:18 to 25) (March 12, 2010)

⁵ CP 407 or RP:16 to 17:10 (March 12, 2010)

defense's Response Brief, as though the trial on March 12, 2010 originated in District Court⁶. Is the author, trying to mislead the reader in his response brief?

a. Jurisdictional Differences

There are differences in procedures and jurisdictions between District Court and Small Claims Court. It is highly unlikely that the author is unaware of the judiciary principle, so one could only surmise that the correct jurisdictional method could only lead to one conclusion, the avoidance of truth from separate entities. Confusion appears to be the course which counsel intentionally wants the mindset of the reader(s) to deter from the violation of Small Claims Court RCW 12.40.080 to elude the differences of correct jurisdictions. Mainly because, in District Court an attorney can defend his spouse and that is the logical reason for Dennis P. Hession to keep referring to District Court instead of the intrinsic language towards the appropriate jurisdiction of Small Claims Court.

b. Change of Venue

The legal avenue for counsel to avoid the mistakes to appear in Small Claims Court was to ask Judge Doug Robinson for a *change of venue*⁷. This arrangement would formulate the proper jurisdictional procedure and prevent other legal errors committed in the rule of law. Understanding the full extent of the exact details in

⁶ The continuous use of District Court versus Small Claims Court is located on page 9 of the Response Brief, as well as the 'The Statement of Case' p. 3 denoting correctly: it is within a District Court Division but a Small Claims Action.

⁷ RCW 4.12.030 the ruling for 'change of venue' so an attorney can legally defend his wife.

this ruling RCW 12.40.025 would help to encompass the reason why, Small Claims do not allow an attorney to defend in this court unless ‘the attorney came from another court and was involved at the time the action was commenced’.

c. “Marital Community” or the term “Community Liability”

The premise of RCW 26.16.190⁸ excludes counsel from exercising the rights of marital community⁹ as an excuse to appear in Small Claims Court by the lower court judge, who misinterpreted the ruling of RCW 12.40.025 with other correlating rules¹⁰. Therefore counsel should have known the correct application of the law¹¹ and the ‘abuse of discretion’ by the lower court to allow an attorney in Small Claims Court¹² developed the reasons for appellate reviews.

As far as Jane M. Hession who accompanied her husband, Dennis P. Hession to the Bing Crosby Theater, as a mayoral candidate on p.22 of the response brief, the challenged issues expressed by counsel does not interfere with the context of the campaign...it’s the harm done while en-route to the ‘Mayoral Debate’ that is in question. In which Jane M. Hession’s consistent demeanor throughout that early evening, on October 15, 2007 seek causes to attack the citizens of Spokane, Washington whom she disapprove of that were against her husband, the mayoral incumbent such as: the firefighter Rachelle Schoenber, who clapped for another

⁸ Brief of Appellant pages 8 to 10

⁹ Brief of Appellant pages 8 to 10 and CP 21 Verbatim Report of Proceedings (March 12, 2010)

¹⁰ Brief of Appellant pages 13 to 14

¹¹ Rules of Professional Conduct 8.4(c)(d) “Misconduct”

¹² CP 21: Applied the wrong application of ruling which evolved as an abuse of discretion.

mayoral candidate, as well as the prior offense committed on a disabled senior citizen, Tari Jane Anderson¹³, wearing a blue sling on her right arm in view of everyone to see¹⁴ and supported the large sign offset to her body¹⁵ in protest exercising the First Amendment which is the issue at present.¹⁶ Where is the threat in this picture? By injuring two citizens, how does the matter benefit the community?¹⁷ Is counsel suggesting the City of Spokane is responsible for “community liability” by the oversight of his wife’s accountability to keep her hands to herself in a public forum?

d. Opponent’s Introduction (Response Brief)

Throughout this litigation, numerous issues were brought on by Dennis P. Hession and by casting aspersions towards the appellant “believes this case to be about many things” is an understatement; when counsel initiated the problems to begin with, this lawsuit would not have dragged on. Tari Jane Anderson had no alternative but to complain and object when *rules were violated and with other legal problems that escalated by the defense*, such as: an abuse of legal practice, not adhering to the RAP Rules and the use of dilatory tactics! All of these atrocities could be found in the Motions of 2012-2013 and in part, within the defendant’s response brief filed in the Court of Appeals III.

¹³ CP 254 to CP 255

¹⁴ CP 24, CP 138 and CP 213

¹⁵ CP 138 and CP 247

¹⁶ CP 24

¹⁷ Response Brief at p.22.

e. Non-Request for Appearance

Apparently, Counsel Dennis P. Hession also incurred the violation of the Washington State Law by appearing unlawfully in Small Claims Court without any 'Notice of Appearance'¹⁸. This legal action is required when an attorney participates in a trial which was not filed in Small Claims. Furthermore, the **Fifth Amendment** was violated when an EX PARTE¹⁹ was initiated by Dennis P. Hession to defend Jane M. Hession, because arrangements for an attorney into Small Claims Court has to be made prior to the trial on March 12, 2010 with fair notice to the other party on legal proceedings. There was none!

f. Obvious Errors Projected in Lower Court

'Real Person of Interest' (FRCP RULE 17)

By stating a "real person of interest"²⁰ concerning Dennis P. Hession, the lower court, Judge Doug Robinson caused an 'abuse of discretion': "**when a court does not apply the correct law or if it rests its decision on a clearly erroneous finding of a material fact**"...US v Rahm 993 F.2d 1405, 1410 (9th Cir '93).

This mistaken interpretation of the Washington State Law led to a series of 'judicial injustice' for Tari Jane Anderson, because in the trial, this unlawful

¹⁸ WAC 10.08.083

¹⁹ CP 107 or RP:2:96 Indicating prior conversation was made between the lower court and counsel, Dennis P. Hession without the other party in attendance, noted in the Brief of Appellant at p. 13 on EX PARTE and CP 268.

²⁰ CP 21 and CP 50: The honorable judge Doug Robinson, pro temp from Whitman County committed an 'Abuse of Discretion' and violated RCW 12.40.080.

procedure at Small Claims Court allowed Dennis P. Hession to play dual roles²¹ which projected an unfair development of the case and the impropriety of the lower court judge to allow this matter to occur and to assume the procedural rules were just.²² This illegal action violates the **Fourteenth Amendment** of the appellant. Furthermore, the fact remains that Jane M. Hession was not incapacitated nor needed a 'Guardian Ad Litem' in Small Claims Court to speak for her at the trial. Dennis P. Hession answered every question asked by the lower court judge except when the defendant testified but with leading questions by counsel²³ and to make matters interesting, the consistent realization that Jane M. Hession forgot her travel directions²⁴ but does admit "what I remember is this person holding a sign in front of herself and positioning herself in front of me" which means, the sign was not put in front of Jane M. Hession's face²⁵ but held on Tari Jane Anderson's arm as she stood perpendicular towards the Hessions while they walked north to south on the corners of northwest Lincoln Street and Sprague Avenue.²⁶ Then the defense's story changes with inconsistencies of different versions of the alleged incident.²⁷

²¹ CP 141 and CP 243: The appearance of confusion in Small Claims Court was due to the fact: the scenario was difficult to distinguish from an attorney to a real person of interest as (marital community defender).

²² Brief of Appellant at p. 16.

²³ CP 94 or RP:12:20 Verbatim Record of Proceedings on March 12, 2010.

²⁴ CP 233 Jane M. Hession repeatedly said "Sprague" Avenue instead of Lincoln Street where they crossed.

²⁵ CP 100

²⁶ CP 23

²⁷ CP 261 to CP 264

g. Hearsay Evidences

In the Hearsay Rule, the written statements made by the other detectives and Brian O'Brien, the Senior Prosecuting Deputy was out-of-court statements, offered for the purpose of proving the truth of the matter asserted, and are therefore 'Hearsay'. On the contrary with this perspective in mind, counsel cannot use 'hearsay evidences' as a means to attack Tari Jane Anderson's fundamental rights for justice. This would be wrongfully indicative as to sway judgment on the appellant especially with the material evidences taken in the year 2009 and applied at both trials as his defense. The alleged incident occurred on October 15, 2007, therefore it is an intrusive way of impinges on the appellant's substantive rights which has only illuminated the stigma of 'prejudice' in the entire spectrum of this lawsuit. The testimony of Detective Ricketts was inconclusive and untruthful at the trial²⁸ and he forgot to note the mark on Tari Jane Anderson's bruise in his investigated records²⁹ by Joel Long at Summit Rehab³⁰. The letters he introduced as evidences from several of the other detectives from the Sheriff Department were in 2009 which were considered 'Hearsay', by the Superior Court Judge Allen C. Nielson³¹. Accordingly, with Patsy Dunn's interview in 2009 by Detective Ricketts, most of the records were redacted and without any name to verify the testimony of the

²⁸ CP 153 to CP 154 and (Brief of Appellant at p. 24) in which Detective Ricketts claims he interviewed Patsy Dunn in 2007 when he actually interviewed her on June 2, 2009.

²⁹ CP 79: Detective Michael Ricketts forgot to note in his investigated report on the bruise.

³⁰ CP 39

³¹ Find in Exhibit B: Page 36: Superior Court Verbatim Report of Proceedings on December 6, 2010.

person questioned, but strange as it may seem, Dennis P. Hession had submitted to the lower court an un-redacted version which was not given to Tari Jane Anderson as she sat in the courtroom on March 12, 2010 that she filed a complaint in the Spokane Courthouse on September 8, 2010.³² Nonetheless, these misstatements of facts were *used in the trial (Small Claims Court³³ as well as Superior Court³⁴), as excerpts of material misstatements* that Judge Allen C. Nielson assumed they were correct which he said on December 6, 2010, he read the “Declaration”³⁵ of Tari Jane Anderson which was a Motion To Strike Patsy Dunn’s testimony of 2009 but did the opposite by stating in the trial record on pages 37 and 38 differently towards the appellant as discriminating evidences. *Oddly enough, the fact remains Patsy Dunn did not signed the document as her own statements.³⁶ Detective Ricketts did not have her name appear on the document³⁷.* In the early part of the investigation (2007), the true version of Patsy Dunn’s own testimony unfolded from the experiences she encountered on October 15, 2007 fresh in her memory; encapsulated in time at KREM 2 NEWS on October 17, 2007.

Consequently, the testimony that Detective Ricketts did convey on the trial record

³² Find in Exhibit B: “Defendant’s Exhibits On Record” September 8, 2010 and in the Superior Court Verbatim Report of Proceeding p. 20 to p. 21 on December 6, 2010 which counsel denied the accusation, but the un-redacted material was filed in the lower court with the “Response to the Police Report” documents and detectives letters.

³³ Find in Exhibit B: CP 72 and CP 73 ‘Patsy Dunn’ (2009) Two years after the alleged incident that occurred on October 15, 2007.

³⁴ Find in Exhibit B: Pages 37 to 38 Superior Court Verbatim Record of Proceedings on December 6, 2010.

³⁵ Superior Court Transcript on Verbatim Record of Proceedings on December 6, 2010.

³⁶ CP 152

³⁷ CP 159

of March 12, 2010 makes it hard to believe that Patsy Dunn would change her statements in (2009) to contradict herself unless she felt strongly intimidated by the detective's coercion.³⁸

What appears to be a mystery, the entire scenario of distorting the truth by the detectives were misstatements of facts that the DVD in 2007 will reveal the truth which speaks a thousand's words but was not delivered to Brian O'Brien³⁹, the Senior Prosecuting Deputy as Sgt. William P. Beeman purported to the appellant. Then when Tari Jane Anderson found out the truth of the matter, she contacted Internal Affairs, Lt. Earl Howerton and complained about the 'round-a-round'.⁴⁰ Somehow, Brian O'Brien's responses to the alleged incident were the opinions of the detectives who were not involved in the case but withheld evidences in 2009⁴¹ and during that episode Brian O'Brien was unaware that the key witnesses Patsy Dunn and Henry Valder were excluded from the investigation in 2007.⁴² The other Sheriff detectives did not enter the picture of the alleged incident of October 15, 2007 until April 24, 2009 when the appellant requested to reopen the case for 'reconsideration' from Captain Jim Goodwin on the grounds that the key witnesses

³⁸ Brief of Appellant at p. 24.

³⁹ CP 150 to CP 151

⁴⁰ CP153 to 154 and CP 205 to CP 206

⁴¹ CP 153 and CP 206 Appellant spoke to Brian O'Brien, Senior Prosecuting Deputy on October 13, 2009 about the alleged incident on October 15, 2007 and he implicated that his hands were tied and the case was difficult to assess because of the election and the fact is: Brian O'Brien used to play in Tari Jane Anderson's pool league (Lilac City Pool League-Open Pocket Billiard) and dated her best friend (Diane Kennedy) years ago...therefore, there was a 'conflict of interest' and the main reason why, Brian O'Brien did not appear in Small Claims Court for the defense.

⁴² Find in Exhibit L: Page 367 (Response to the Police Report) April 24, 2009 and (CP 206) the telephone conversation between Tari Jane Anderson and Brian O'Brien, Senior Prosecuting Deputy on October 13, 2009.

were not investigated⁴³. On October 13, 2009⁴⁴ I spoke with Brian O'Brien therefore Dennis P. Hession has misled the 'opening of his argument' in the response brief by proclaiming two years in the making. There were only 11 days of sloppy investigation in 2007 without Patsy Dunn and Henry Valder's testimonies, because they were completely left out from the beginning of the investigation. The pursuit for justice developed after Tari Jane Anderson recuperated to some degree from the injuries on January 28, 2009⁴⁵ due to the whiplash⁴⁶ and the torn ligament on the lower edge of her right foot⁴⁷ and wore an ankle brace for nearly 9 months.⁴⁸ Then the journey began on a legal quest to find a true sense of perseverance for the truth with the true revelation of what occurred on October 15, 2007.

h. Admissible Hearsay Evidences

The following witnesses for Tari Jane Anderson were taken and interviewed shortly after the alleged incident in 2007 fresh in their memories what they saw and encountered on October 15, 2007. There are two types of Admissible Hearsay: "Excited utterances or spontaneous statements" and "Present sense impression."

⁴³ CP 205: (Response to the Police Report) April 24, 2009: hand-delivered personally to Captain Jim Goodwin of the Sheriff Department and personally spoke to him...I believe on May 5, 2009.

⁴⁴ Find in Exhibit L: Page 367 (Response to the Police Report) April 24, 2009 and reconnect with CP 153 to CP 154.

⁴⁵ Response to the Police Report (Front Page) April 24, 2009

⁴⁶ CP 28

⁴⁷ CP 23

⁴⁸ CP 24

1. When Patsy Dunn in 2007, expressed adamantly on what happened during the northwest corner of Lincoln Street and Sprague Avenue with Tari Jane Anderson and Jane M. Hession, in the interview with Ofalo Richards on October 17, 2007; KREM 2 NEWS which the DVD entails as evidences, is filed in the Court of Appeals III, she was in a state of 'excited utterance'.
2. As for Claudia Johnson, she expressed her statements with 'spontaneous statements' in response to a startling event in how Jane M. Hession broke away from her husband,⁴⁹ saw Jane M. Hession walked towards Tari Jane Anderson,⁵⁰ wearing a sling; but did not see where the actual contact was on the appellant's body⁵¹ but the knowledge she imbued: "it was a forceful motion"⁵² in regards to the physical impact when Jane M. Hession leaned into the appellant⁵³ which caused an intentional act of battery; and at the trial on March 12, 2010, Claudia Johnson was compelled to relate the confusion about the missing KXLY footages⁵⁴ with 'excited utterance'.
3. Kathleen Binford was in the state of shock and bewildered from the event but managed to elucidate details to tell Detective Ricketts what occurred that early evening in which she seen and witnessed Jane M. Hession push Tari

⁴⁹ CP 31

⁵⁰ Page 239

⁵¹ CP 31 or RP:7:20

⁵² CP 31 or RP: 16 to 17:20

⁵³ CP 340

⁵⁴ CP 47

Jane Anderson with her right arm⁵⁵ wearing a sling, during the early evening of the mayoral debate⁵⁶ but still remaining to “hold up the sign with her left hand” after the push⁵⁷ when there was ample room for Jane M. Hession to pass⁵⁸ through the walk way to the crosswalk with ‘excited utterance’.

4. Then there is Jill Jolly who witnessed Jane M. Hession push Tari Jane Anderson⁵⁹ because of the sign she was holding which Jane M. Hession felt provoked⁶⁰ by the wording on the sign that offended and angered her,⁶¹ and Jill Jolly did not know the extent of Tari Jane Anderson’s injuries⁶² but with disbelief could only excuse the behavior of the First Lady of Spokane City, fall from grace with ‘excited utterance’.
5. With the same expression of Jill Jolly, Henry Valder was stunned from the assault and battery of Jane M. Hession towards the appellant⁶³, because he stood behind Patsy Dunn and the victim, Tari Jane Anderson looking over their shoulders as the Hessions walked towards the northwest corners of Lincoln Street and Sprague Avenue and saw Jane M. Hession break away from Dennis P. Hession and walked towards the appellant: relating an

⁵⁵ CP 69

⁵⁶ CP 68 to CP 69

⁵⁷ CP 69 or RP:4 to 6: 58

⁵⁸ CP 67 and Find in Exhibit G: Page 309...Henry Valder and Patsy Dunn’s Testimony on “ample room”. With pictures, on Exhibit L: Page 371 shown “ample room”.

⁵⁹ CP 70 to CP 71

⁶⁰ CP 70 to CP 71

⁶¹ CP 71

⁶² CP 156

⁶³ Find in Exhibit A: Pages 278 to 279 Henry Valder’s Affidavit

observation of an intentional push by Jane M. Hession with ‘present sense impression’ cried out with frustration, felt angry that the Hessions violated the First Amendment of the Constitution as the signers protested peacefully holding signs, yelled the loudest at the Hessions as they paraded the four corners of Lincoln Street and Sprague Avenue without holding hands and screamed at their audacity to infringe on the protestors, as there were ample room to walk through the cemented walk way to the crosswalk.⁶⁴

i. Missing KXLY Footage

The most important aspect of this lawsuit was the missing footages that could reveal what had occurred on October 15, 2007, but for some reason, these footages became lost or destroyed and perhaps, purged by KXLY.⁶⁵ What appeared strange in the investigation held by Detective Ricketts was the fact that the only remaining footages of the KXLY tapes were of Tari Jane Anderson after the alleged assault and battery. These footages will also show that the Hessions came from the north on Lincoln Street and not on First Street down to south Lincoln Street as Dennis P. Hession professed in the Spokesman Review Newspaper written by Jim Camden on October 17, 2007.⁶⁶ Therefore, in retrospect why was this ill-fated attempt

⁶⁴ Find in Exhibit G: Page 309 and Exhibit L: Page 371 “ample room”.

⁶⁵ CP 236: In the Objections to the ‘Findings of Fact and Conclusion of Law’.

⁶⁶ Find in Exhibit B: Page 282 News Clip of where Dennis P. Hession mentioned where they came from: First Street down onto Lincoln Street, which is untrue on October 17, 2007, written by Jim Camdem, political analyst.

expressed in the news without a retraction,⁶⁷ for everyone to know in Spokane and within the surrounding areas in Washington State, as not to expose the truth and to keep the truth concealed from the public: for what reasons, but the guilt of the alleged offense that would jeopardize the election? What happened to the films of surveillance cameras on the buildings in the vicinity of the alleged crime?⁶⁸

B. The violation in the Rules of Appellate Procedures in Defendant's Response Brief interlaced the facts with inappropriate standards that are not only wrong but applied erroneously, which the Court of Appeals III ordered the 'Objections' to be stated in the "Reply Brief".

1. 'Twist and Turn' of Transcript's Record of Abuse

In accordance with **RAP RULE 10.4** Preparation and Filing of Brief by party, as indicated on **(f) Reference to Record "part of record"**, the appellant finds that counsel in his response brief cited the wrong page number (p.30) of Judge Allen C. Nielson's quote in the Superior Court verbatim record of proceedings.⁶⁹ Then when the request for the correct page number was brought to his attention, he ultimately said, the transcript record could be found on "p. 29" but to no avail⁷⁰, so why the pretense with the cloak and dagger routine? Why couldn't Dennis P. Hession be more explicit and with candor instead of created a "twist and turn" of record abuse that brought multiple 'motions' into play within this case, as far as purporting these falsity approaches to the doorsteps of the Supreme Court?

⁶⁷ CP 117 Spoke to Jim Camden regarding the false statement of the Hessions' travel.

⁶⁸ Written Reply To The Answer To The Motion, Pursuant to RAP 17.4(e) p.9 #13.

⁶⁹ Appendix

⁷⁰ Appendix

Tari Jane Anderson's reliance on counsel's credibility in the response brief has been challenging with the "extreme case of record abuse": Coburn v Coburn, 230 Mich App 118, 120 (1998) *manipulating legal records of the Superior Court transcript of December 6, 2010* to gain an edge in discrediting the DVD that counsel has tried in vain to dispose of for the absolute truth since the beginning of this lawsuit, again, with multiple motions to suppress evidentiary facts.⁷¹

The intention to commit fraud and misrepresentation on the Superior Court verbatim record of proceedings was fallaciously place under the heading of *D. Supplemental Evidence Submitted for Consideration at the Court of Appeals* on p. 24 of the defendant's response brief quoted "*Judge Nielson said of the testimony*", which appeared erroneously deceptive "*This is of little relevance in my mind*" and "*...it is not particularly important, and it is not all together clear what happened there*" *Sup Ct. RP30*. This quote is found in the Superior Court Transcript on p. 35 on December 6, 2010 Verbatim Record of Proceedings!⁷²

Therefore, in preparation of the Reply Brief by Tari Jane Anderson's research of previous documents were re-read and scrutinized and in the discovery: Dennis P. Hession "**deliberately falsified**" and "**manipulated**" the pages in his response brief of where the true quotes of Judge Allen C. Nielson were addressed in this situation: **Donna McKereghan's Testimony!** Within this testimony on p. 35 of

⁷¹ Motion for Additional Evidence for Review (December 21, 2011)

⁷² Appendix

the Superior Court verbatim record of proceedings, Donna McKereghan saw and testified in court on December 6, 2010 that Jane M. Hession struck the firefighter, Rachelle Schoenber (last name may be misspelled) in the Bing Crosby Theater right after Jane M. Hession pushed Tari Jane Anderson outside of the building on the northwest corners of Lincoln Street and Sprague Avenue. This intentional assault and battery was done, due to the fact that Rachelle Schoenber was clapping for another opponent running for Mayor on October 15, 2007⁷³ and Jane M. Hession became irritated with the sounds of clapping that she became angry, turned around and slapped the hands of the firefighter down to her lap.⁷⁴ This alleged crime is described in the DVD by the victim submitted into the Court of Appeals III with Rachelle Schoenber's complaints based on "excited utterances" on October 17, 2007 of the KREM 2 NEWS television report. The "limited relevance" in CP 37 or RP 26 on p.24 of response brief was the testimony of Donna McKereghan on Jane M. Hession's demeanor⁷⁵ in the Bing Crosby Theater: another misrepresentation in 'reference to record' on 'extreme record abuse'.

2. Waiver of "Assignment of Error"

The divergence of the Defendant's Response Brief from the legal facts and inappropriate standards are basically wrong and without evidentiary proof in their respective statements which are found throughout the entire written material. Due

⁷³ CP 177 to 178

⁷⁴ CP 31 Represents: Claudia Johnson's testimony with (CP 34) Donna McKereghan's version of testimony.

⁷⁵ CP 36 to CP 37 Jane M. Hession's demeanor

to the June 12, 2012 letter from the Court of Appeals III regarding the timely manner to file a Notice of Cross Appeal, Dennis P. Hession did not respond, waived his rights to object, but now at the closing segment of this case, counsel has presented illegally the “Assignment of Errors” which he was denied three times on his response brief by default and refuses to adhere to the legal restrictions of RAP. Counsel undoubtedly formulated his own issues with disregard to the Rules of Appellate Procedure, time and time again.⁷⁶ In the course of writing the response brief, counsel initiated a reckless disregard for the truth not only in the (Statement of Case) which the ‘Plaintiff’s Objections to the Findings of Fact and Conclusion of Law’ were previously answered⁷⁷, but in the (Argument) for the defense appears misconstrued by the “responses to the police record” on April 24, 2009. Therefore, the team of researchers in the Court of Appeals III should review the evidentiary materials with “strict scrutiny” into the original transcript of March 12, 2010 and the Superior Court Transcript of December 6, 2010 to discover the falsity in the response brief with several violations of the RAP RULES and in particular Title 10.

3. FACTS and STANDARDS (Response Brief)

The scenario of the facts and standards are met with many styles of written ambiguities that, in whole and in part, of the response brief have shown not only to

⁷⁶ Violation on RAP 10.3(5)(6)(7)(b) 3rd. Sentence: Was not allowed for the “Assignment of Errors”.

⁷⁷ CP 228 to 275 Filed on April 8, 2011 Violation on RAP 9.1(d) Avoid Duplication by Response Brief p.2 to p.7.

be confusing in the way they are addressed, but they are referenced sporadically without merits on the record and in some fashion does not appear conclusive. As though, the whole legal framework are guesswork of an inappropriate purported conclusions that are pieced together as something done in haste with no relevant parts at all: This action of falsehood prompted the appellant to request a Motion To Strike⁷⁸ and to request a Motion To Modify Commissioner Ruling⁷⁹, in part that the Court of Appeals III ordered the 'Objections' to be entered in the Reply Brief⁸⁰ which the appellant has found that counsel offends the rule of law by not abiding to the Rules of Appellate Procedures and refuses to heed to the letters of the Clerk of the Court for the Court of Appeals III.⁸¹

4. Small Claims Trial (March 12, 2010)

In the lower court, the appellant had a difficult time to formulate the questions⁸² into perspective for cross-examination without knowing firsthand before the trial that the procedural rules of court⁸³ would be in the manner that Judge Doug Robinson, a pro temp from Whitman County expected in his courtroom. The changes of procedural rules were affected in Small Claims Court with the bias

⁷⁸ Filed July 12, 2012

⁷⁹ Filed September 20, 2012

⁸⁰ Received a copy of the Order Denying Motion To Modify Commissioner Ruling.

⁸¹ Clerk's Papers Returning 'Respondent Brief': May 17, 2012, June 12, 2012 and June 29, 2012.

⁸² CP 85 or RP:18 to 21:74 Difficult time for the appellant to form questions.

⁸³ Brief of Appellant at p.16: Violations of Procedural Rules in Small Claims Court.

approach of the lower court judge and the impropriety of his actions⁸⁴ towards Tari Jane Anderson in the judicial forum, that the loss for questions⁸⁵ could not stand a chance against an attorney, let alone being the appointed ex-mayor of Spokane, Washington that influenced the lower court judge at every turn⁸⁶ when Dennis P. Hession's Oath of Office should have been to protect its citizens, foremost.⁸⁷

5. Answers to Assignment of Errors

In response, Tari Jane Anderson will answer the main issues regarding the 'elements of claim', set forth in the "Assignment of Errors" which were done illegally due to the waiver of such right, by Dennis P. Hession to reiterate, in part; reflections in the (Brief of Appellant at p.18) and CP 257 to CP 263 with emphasis added to the answers of the defense's statements in the response brief as follow:

- (1) At the time of the trial on March 12, 2010, the theory behind proving the 'elements of claim' were difficult without the experiences of a lawyer's knowledge in how to present the case efficiently, unaware of the rights involved, and displaying some of the evidences and exhibits objectively without the denial of the lower court judge.⁸⁸ Therefore, to lose under these conditions only intensified the situations more to improve with every step of

⁸⁴ CP 143, CP 147, CP 145, CP 146, CP 147, CP 150, CP 173, and CP 174 (Appellant's Opening Brief) as "Impropriety of Judge Doug Robinson" in Small Claims Court.

⁸⁵ CP 164 or RP:4 and 5:90

⁸⁶ CP 273

⁸⁷ Brief of Appellant at p. 11

⁸⁸ CP 147

the way by legal research at Gonzaga University Library: what is right and what is wrong in these legal perspectives, not to the merits of the case per se, but to the absence of counsel for legal advice suggested by Judge Allen C. Nielson in Superior Court on December 6, 2010.⁸⁹

- (a) This is where the Constitution of the United States that governs the **First Amendment Article 1 Section 3: 'Freedom of Speech and Print'** and the **Washington States Constitution Article 1 Section 4**⁹⁰ **'The Right of Petition and Assemblage'** fall into play: Dennis P. Hession stated "Jane extended her right arm toward the sign the female was holding to push it out of the way so they could step into the crosswalk".⁹¹ In this entire Spokane Police Report, "strict scrutiny" should be acknowledged and examined to the fullest details of its reported circumference, and using the pictures to identify the area: Exhibit I Page 332 'Scene of Alleged Crime'.
- (b) "In theory, there should be no problem of proximate cause if the event is within the hazard that the statutes are intended to avert": therefore, Jane M. Hession violated the constitutional rights of Tari Jane Anderson by abridging the freedom of speech (the sign she was holding), infringing on the freedom of the press (the printed words on

⁸⁹ Superior Court Verbatim Report of Proceedings: Page 47 or RP: 14 to 17:47.

⁹⁰ CP 411

⁹¹ Find in Exhibit A Page 283 Police Report October 16, 2007

the sign that offended Jane M. Hession⁹² to extend her right arm towards the sign) as a show of assault⁹³: the contact as an abuse of “battery” to the senior citizen wearing a sling which inflicted a bruise on her stomach⁹⁴ under the sling-arm, then commit an intrusion against the protestor for the right to peacefully assemble (to push it out of the way so they (Hessions) could step into the crosswalk) causing chaos and carelessness on the breach of duty, by prohibiting the petition for a governmental redress of grievous on the ‘Trash in Spokane Coalition’, a community of Corbin Park residents⁹⁵, that the damages to the appellant were \$10,034.43.⁹⁶

- (c) “The injuries must have a direct and proximate connection with the violation of the statutes before liability will be held to exist. It is the existence of this ‘cause and effect’ relation which makes the negligence of the defendant actionable”.⁹⁷ **1 Restatement of Torts Section 431** defines an actor’s negligent conduct to be a legal cause “*proximate*” if (1) his conduct is a substantial factor in bringing about the harm, and (2) there is no rule of law relieving the actor from

⁹² CP 65 or RP:1 to2:54 Verbatim Report of Proceedings March 12, 2010.

⁹³ Washington State Courts-Court Rules...RULE 9 ‘Pleading Special Matters’.

⁹⁴ CP 61: Hit the stomach of appellant and CP 78 Bruise of the infliction caused by Jane M. Hession’s push.

⁹⁵ CP 22 , CP 231 and CP 411

⁹⁶ CP 25

⁹⁷ “Torts” (Cases and Materials) Prosser, Wade and Schwartz...Tenth Edition (2000) (209 to 211)

liability because of the manner in which his *negligence* has resulted in harm.”⁹⁸

C. The supporting case laws, in whole and in part to govern the issues at hand are erroneously ‘applied authorities’ due to the jurisdictions in the legal forum.

In the following “precedents” of these cases asserted below do not in whole, or in part, meet the required supporting case laws of the ‘response brief’ prepared by the defense, which some of them have been previously addressed by the appellant in the reply brief on November 1, 2010. Consequently, these supporting case laws shown below are not absolutely essential to the decisional reasoning and opinions of the judiciary in their own perspective, because they do not project the merits of the case. Inadvertently, with due respect to these tangential thoughts, the issues do not apply or rather connect to this particular case; therefore the chosen supporting case laws do not constitute the precedents that are invoked by the judicial decisions, but are subjected to non-binding dicta on the basis that some insignificant factual differences do not comply, which the defense tries to implicate. Consequently, “a case is only precedent as to a particular set of facts and the precise legal issue decided in light of those facts”...by attorneys Stephen Elias and Susan Levinkind, ‘**Legal Research**’ (1992). On the contrary, the improper citations are as follow:

⁹⁸ “Torts Capsule Summary” Chapter 12 ‘Proximate or Legal Cause’ Section 12.03 Proximate Cause Tests {216-226}

- a. **Carrol v Junker, 79Wn.2d 12 26 482 P.2d 775 (1971)**
- b. **Coggle v Snow, 56 Wn. App 499, 784 P.2d 554**

The underlying composite of these supporting case laws projected by the defense does not render the same language of the judicial decision as correct citations in the matter of law, regarding these cases. For one in particular, the rules of Small Claims do not make concession for **RCW 12.40.080** in the sense that “No Attorney At-Law” is allowed in Small Claims Court, except for its correlating statutes of **RCW 12.40.025, CR 4.2 (a) (b) and CR 70.1 (b)**; therefore to compare the supporting case laws as **“a sound judgment exercised with regard to what is right under the circumstances”...is basically incorrect which violates the ruling of an existing statute and its correlated statutes noted above.** The judicial decision in these cases, did forego the laws purported by Judge Doug Robinson, pro tem from Whitman County which the lower court incorporated an action that was arbitrary and capricious. The results caused harm to Tari Jane Anderson, because an arbitrary decision is one vested without any regard for the facts and the legal circumstances presented capriciously connotes a disregard of the evidences in violation of the **Fifth Amendment.**

Consequently, the evidences bear the stamp of the Revised Code of Washington and pursuant to the effect **“is a compilation of all permanent laws now in force”...Washington State Legislature.** This premise should have been legally

recognized instead of simply ignored by the lower court of Small Claims, the Honorable Judge Douglas Robinson and unresolved by the trial court of the Superior Court, the Honorable Judge Allen C. Nielson as well as the opposing attorney, Dennis P. Hession. These rules are not harmless error but violations of existing statute laws.

In accordance to the law, the legal action of the defense should know that “the court cannot use judicial review, to strike down a state law which is contrary to the Constitution. When the court uses judicial review to enforce the pseudo-Constitutional rights they are **“stealing the legitimate law-making power from the state legislatures”...Griswold, Roe and Casey, ‘Substantive Due Process’**. Therefore, these citations are inappropriate to portray the language used to enforce as supporting case laws, because they eliminate the existing statutes and do not relate to the situations in these cases:

- c. **deElche v Jacobsen, 95 wn.2d 237, 622 P 2d 835 (1980)**
- d. **Clayton v Wilson 168 Wn.2d 57, 227 P. 3d 278 (2010)**
- e. **Proctor v Huntington, 146 Wn. App 836, 192 P. 3d 958 (2008)**

With all due respect, the following assertions on these supporting case laws do not fit in with the existing statute **RCW 12.40.080** “No Attorney-At-Law” that governs the Washington Statute Laws, but Tari Jane Anderson reiterates the rulings for Dennis P. Hession. The above citations cited in the defendant’s response brief did not apply within the context of the adversarial dispute nor mirrors its intent: **RCW**

26.16.190. This ruling is a Washington legal statute that concerns separate property not community rights and obligations. In addition, one of the supporting case laws above does not warrant permission for an attorney to defend liability in marital community in Small Claims Court which the case was determined in Superior Court that is permitted and brought to Supreme Court for an Appeal...with the exception of the added supporting case law which does not mirror the purported situation, due to the existing rule of **RCW 26.16.190**. The ruling states: “For all injuries committed by a married person or domestic partner, there shall be no recovery against the separate property of the other spouse or other domestic partner except in cases where there would be joint responsibility if the marriage or the state registered domestic partnership did not exist”⁹⁹. Therefore, the discretionary manner to allow counsel, Dennis P. Hession to perform in Small Claims Court was an ‘abuse of discretion’ by Judge Douglas Robinson, a pro tem from Whitman County.

f. Collier v Momah 2008 Wash App. Lexix 1529 (2008)

The main objective in this supporting case law is, in part, the “Statute of Limitations” not pertaining to the battery that was mentioned, but accordingly to the appellant Tari Jane Anderson, who filed her claim on a timely manner without any regard towards the citation as a whole.

⁹⁹ CP 271 to 272

g. **Garratt v Dailey, 46 Wn. 2nd 197, 279 P. 2d 1091, 1093 (1955)**

In this supporting case law, the ‘intentional tort’ refers to the unforeseeable doctrine adopted by the defendant, Jane M. Hession, but in the **Spokane Police Report**, Dennis P. Hession states: “Jane extended her right arm toward the sign the female was holding, to **push it out of the way** so they could step out into the crosswalk¹⁰⁰.” **Jane M. Hession knew with certainty that her outstretch arm would injure Tari Jane Anderson and in doing so, created a desired act to cause harm and do so...FLUKE CORP v HARTFORD ACC. & INDEM. CO., 14 WASH. 2d. 137, 34 P.3d 809 (2001) which denotes ‘that the offended and angry defendant acted with a purpose to achieve the result of her act as a voluntary one’...therefore, this case contends:** an ‘intentional harm’ “focus on what the actor sought to achieve or knew would occur, rather than on his motives for acting.” Therefore, this tort action infers to **SPIVEY v BATTAGLIA p. 20, SP of Florida (1972)** in which “an intentional tort may also be defined as an act which a reasonable person knew or should have known would have led to an injury to a person or property”.¹⁰¹ It is for this reason why, Claudia Johnson’s testimony at the trial on March 12, 2012 “Claudia said it appeared that just before Tari

¹⁰⁰ Spokane Police Report (Detective Ricketts’ Report) of Mr. Hession’s statement on October 22, 2007: 5th. Paragraph 7th Sentence.

¹⁰¹ Brief of Appellant at p.30 and CP 409: Mike Fitzsimmons, KXLY 920 News Scope Host on his wrongful law of torts.

stumbled backwards, Jane leaned into Tari”¹⁰² and “it was a forceful motion that I saw”¹⁰³ in the early evening of October 15, 2007, on the corners of Northwest Lincoln and Sprague Avenue. Therefore, this supporting case law does not comply towards the high standard for which it should be used as a citation to base its authority, because **Jane M. Hession was fully aware of the view and the scene in front of her eyes ...RESTATEMENT (SECOND) OF TORTS SECTION 8A (1965)** denotes: “that the actor desires to cause consequences of his act, or that he believes that the consequences are substantially certain to result from it.”

Secondly, if Tari Jane Anderson was approaching Jane M. Hession as the defense indicated, then her outstretched arm would move the victim forward as ‘double over’ by being speared from a frontal attack and not falling backwards onto the appellant’s right foot for support¹⁰⁴ and held up by a witness, Henry Valder on which the battery created a whiplash that proves a push and shove occurred by such intentional action.¹⁰⁵ That is why Jill Jolly said “she believes Jane Hession’s best choice would have been to ignore the sign.”¹⁰⁶ This statement proves Jane M. Hession *was not in ‘Harms way’!* A reasonable and prudent person would have taken care and use caution as the most prevented measure to pass through the open walk way to the crosswalk and respect the protestors as they have a right to

¹⁰² Find in Exhibit J: Page 340

¹⁰³ CP 31

¹⁰⁴ CP 170 and CP 171

¹⁰⁵ CP 25

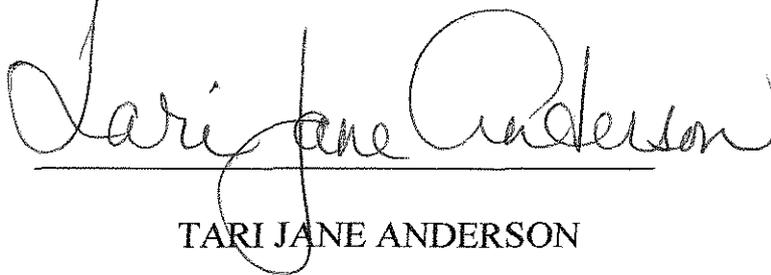
¹⁰⁶ CP 71

exercise the **United States Constitution First Amendment Article 1 Section 3** and the **Washington State Constitution Article 1 Section 4** without interference.

CONCLUSION

By virtue of the foregoing, Tari Jane Anderson has been damaged by the violations of the constitutional rights by Jane M. Hession and seek recovery of damages caused thereby, prayer for relief wherefore, appellant prays for judgment as follow: (a) Certifying this action as a 'Personal Injury Claim' of this complaint and (b) Awarding appellant compensatory damages as reimbursement to HCA¹⁰⁷ including 'pain and suffering', together with appropriate prejudgment interest at maximum rate allowable by law and (c) Awarding appellant costs and expenses for this litigation including other disbursement and miscellaneous expenditures.

Respectfully submitted the 5th day of June 2013



The image shows a handwritten signature in cursive script that reads "Tari Jane Anderson". The signature is written in black ink and is positioned above a horizontal line. Below the line, the name "TARI JANE ANDERSON" is printed in a bold, sans-serif font.

TARI JANE ANDERSON

Self-Represented

¹⁰⁷ CP 260 and RCW 43.20B.060: "Recovery of Assignment for Reimbursement" (Roy Vervair) Tort Legal Advisor.

APPENDIX

Tari Jane Anderson
504 W. Cleveland Avenue
Spokane, Washington 99205-3211
(509) 328-2402 Residence
(509) 216-1608 Spouse Cell Phone

APPENDIX

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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF SPOKANE

TARI JANE ANDERSON,)
)
 Appellant,)
)
 vs.)
)
 JANE M. HESSION,)
)
 Respondent.)
 _____)

NO. 10-2-01417-3
COA NO. 299279

VERBATIM REPORT OF PROCEEDINGS

THE COURT: The Honorable Allen C. Nielson
DATE: 6 December 2010
REPORTER: Samantha A. Drummond, CSR, RPR
West 1116 Broadway, Department 6
Spokane, WA 99260-0350
(509) 477-4413

APPEARANCES

FOR THE PETITIONER:	FOR THE RESPONDENT:
Ms. Tari Anderson	Mr. Dennis Hession
Pro Se	Attorney at Law
504 West Cleveland Avenue	2818 South Scott
Spokane, WA 99205	Spokane, WA 99203

1 your falling back part of the incident.

2 Let me move on here now. Donna McKereghan. She
3 provided testimony, or her information was before the
4 court. This is now the incident in the theatre, as I
5 understand it. Ms. Hession is seated there. There was
6 a female firefighter seated behind her. There was some
7 kind of an exchange between them. This is of little
8 relevance in my mind. It might show that there is still
9 some emotion running, you know, a few minutes later in
10 the theatre, but, again, it is not particularly
11 important, and it is not all together clear what
12 happened there. There was, apparently, some
13 communication between the firefighter and Ms. Hession
14 about what was going on at that point.

15 But let me move ahead here. The next one that I
16 have would be Jade Shumaker. This is, essentially,
17 testimony now by your family member about the effect of
18 what happened. She would say on your physical
19 well-being that you were hobbling around and you had
20 your arm in a sling, you had to continue to have that.
21 So she talks about how it disrupted your personal life,
22 your day-to-day life.

23 Monte Anderson testified. Mr. Anderson, I take
24 it, is here today. So Mr. Anderson testified. He did
25 not go to the debate, but he explains that when you got

appeared only by affidavit at the first trial. She also brought other documents and photographs which she intended to introduce. However, Judge Nielson informed her that this was a Trial de Novo "on the record" and that other evidence would not be permitted. Sup Ct. RP 20-21.

D. Supplemental Evidence Submitted for Consideration at the Court of Appeals.

The Appellant moved this Court for an Order to Supplement the Evidence on Review which was granted on January 27, 2012. Neither Judge Robinson who viewed the DVD at trial, nor Judge Nielson who consider the testimony of witnesses regarding matters which were discussed on the DVD considered the evidence to be noteworthy. Judge Robinson described it as having "limited relevance", RP 26, and Judge Nielson said of the testimony, "This is of little relevance in my mind" and " . . . it is not particularly important, and it is not all together clear what happened there" Sup Ct. RP 30.

NO REFERENCE
TO RECORD ON
EITHER PAGES,
30 OR 29

1 very good job. If you look at the reply brief, sir, the
2 front page, it says that they left Henry Valder out and
3 Patsy Dunn out in the beginning.

4 The investigation was only for eleven days. On
5 that eleventh day, that morning is when the sheriff
6 talked to Jane Hession. It wasn't at the beginning,
7 because the incident occurred October 15th. This was
8 mentioned in the trial with a newspaper. This will
9 prove he is, at that time, the appointed mayor in 2007.
10 This was October 17, 2007. Hession said him and his
11 wife were at the corner at First and Lincoln when they
12 actually came from Riverside. They walked up, and she
13 broke away from her husband. Claudia Johnson will
14 testify to that. Henry Valder will testify to that. We
15 did not get Kathleen Binford and Jill Jolly. I didn't
16 think I needed them. But, you know, I will at the
17 trial. If you notice in the response brief, in the
18 conclusion of Dennis Hession, it says that contact was
19 made. But he said, in his just deliberation, she
20 touched only the sign. That did not occur. No. NO.
21 (Sic.)

22 Inconsistencies. I can point out
23 inconsistencies. Page 82, Jane Hession said that she
24 stuck her hand out there -- And she is saying that I
25 held the twenty-two by twenty-eight sign. That is a big

1 may rise to a felony if the victim is, for instance, a
2 child or a senior citizen. (Sic.)

3 I am sixty-six. I was sixty-three then. The
4 understanding of compassion does not exist in my mind.
5 I understand the sanctity of marriage and the human
6 nature to protect and defend, but what Jane Hession did
7 is wrong. Jane Hession caused pain and suffering not
8 only on a senior citizen but the burden of hardship on
9 an entire family. (Sic.)

10 In retrospect, I ask for compensatory damages and
11 pain and suffering. It is the right thing to do. Our
12 country was built as a nation of laws. Because we do
13 not live in a perfect world, some people do go
14 unrestrained and should be accountable for their
15 actions. Justice is what makes us safe. Consequently,
16 every person has a right from hostile assault that
17 threatens danger to a person intentionally or
18 negligently.

19 Therefore, on the grounds of miscarriage of
20 justice, I move the court for summary judgment and to
21 reinstate the plaintiff's case against Jane Hession for
22 trial de novo.

23 To talk about Detective Ricketts, everything he
24 presented at the trial, if you look at the transcript,
25 is all hearsay. The investigative case, he did not do a

RCW 12.40.080

Hearing.

(1) No attorney-at-law, legal paraprofessional, nor any person other than the plaintiff and defendant, shall appear or participate with the prosecution or defense of litigation in the small claims department without the consent of the judicial officer hearing the case. A corporation may not be represented by an attorney-at-law or legal paraprofessional except as set forth in RCW [12.40.025](#).

(2) In the small claims department it shall not be necessary to summon witnesses, but the plaintiff and defendant in any claim shall have the privilege of offering evidence in their behalf by witnesses appearing at trial.

(3) The judge may informally consult witnesses or otherwise investigate the controversy between the parties and give judgment or make such orders as the judge may deem to be right, just, and equitable for the disposition of the controversy.

[1997 c 352 § 3; 1991 c 71 § 2; 1984 c 258 § 65; 1981 c 331 § 12; 1919 c 187 § 8; RRS § 1777-8.]

Notes:

Court Improvement Act of 1984 -- Effective dates -- Severability -- Short title -- 1984 c 258: See notes following RCW [3.30.010](#).

Court Congestion Reduction Act of 1981 -- Purpose -- Severability -- 1981 c 331: See notes following RCW [2.32.070](#).