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STATE OF WASHINGTON
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Supreme Court No. 925372
Court of Appeals No. 72533-5-I

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IN THE SUPREME COURT OF THE STATE OF WASHINGTON

HAITHAM JOUDEH
Petitioner/Appellant

vs.

PFAU COCHRAN VERTETIS AMALA, PLLC, a Washington
Professional Limited Liability Company d/b/a PFAU COCHRAN
VERTETIS KOSNOFF, PLLC, et al.

Respondents

JOINDER IN MOTION TO CONSOLIDATE

BRIAN H. KRIKORIAN, WSBA #27861
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Attorneys for Appellants Ronald Auer/
John Traster, Case No. 92778-2

FILED AS
ATTACHMENT TO EMAIL

1

 ORIGINAL

Petitioner Haitham Joudeh has filed a motion before this Court to consolidate it's Petition for Review with the undersigned's Petition for Review filed in the matter of *Auer v. Leach*, Washington Supreme Court Case No. 92778-2.

Petitioners Ronald Auer and John Traster concur that issues in both this matter and the *Auer* Petition touch on the same, fundamental issues of how a legal malpractice plaintiff proves proximate cause, and whether an expert is required to establish the proximate cause element of malpractice. Petitioners Auer and Traster further agree and concur that this issue is becoming a common argument made in legal malpractice cases, and as Amicus Attorneys Liability Protection Society (ALPS) has argued in the *Auer* matter, "is an issue that frequently emerges in legal malpractice cases in Washington."

Petitioners Auer and Traster submit that absence definitive guidance from this Supreme Court, the trial courts and appellate courts will continue to issue conflicting rulings on this issue, and will create resulting confusion as to the standard based upon existing legal precedent as argued in both Petitions. As such, good cause exists for this Court to consider both Petitions together and grant review in each matter.

Dated: March 7, 2016

LAW OFFICES OF BRIAN H. KRIKORIAN

A handwritten signature in black ink, appearing to read "Brian H. Krikorian". The signature is fluid and cursive, with the first name being the most prominent.

By _____
Brian H. Krikorian, WSBA # 27861
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Telephone: 206-547-1942
Attorney for Ronald Auer and John Trastger

On March 7, 2016, I caused to be served a copy of the document described as **Joinder in Motion to Consolidate** on the interested parties in this action, by United States, First Class Mail and email, addressed as follows:

Philip Meade
Merrick, Hofstedt & Lindsey, P.S.
3101 Western Avenue, Suite 200
Seattle, WA 98121
Attorney for Respondents Leach and Anderson Hunter, et al.

Brian J. Waid/Jessica M. Creager
5400 California Ave. SW, Suite D
Seattle, WA 98136

Jeffrey P. Downer/Spencer N. Gheen
Lee Smart, P.S., Inc.
One Convention Place, Suite 1800
701 Pike Street
Seattle, WA 98101

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

Executed this 7th day of March, 2016.



Brian H. Krikorian

OFFICE RECEPTIONIST, CLERK

To: Brian Krikorian
Cc: Brian J. Waid; Philip Meade; Jeffrey Downer
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Supreme Court Clerk's Office

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From: Brian Krikorian [mailto:bhkrik@me.com]
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To: OFFICE RECEPTIONIST, CLERK <SUPREME@COURTS.WA.GOV>
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Subject: Filing in Case No. Supreme Court No. 925372

To the Clerk,

Please find the attached Joinder to Motion to Consolidate to be filed in *Haytham Joudeh v. Pfau Cochran Vertexes Amala*, et al., Case No 925372, filed on behalf of Ronald Auer and John Traster.

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