No. 47688-6-II
Clark County Superior Court No. 14-1-01698-1

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION TWO

STATE OF WASHINGTON,
Plaintiff-Appellee,
v.

DAVID NOVICK,
Defendant-Appellant.

ON APPEAL FROM THE SUPERIOR COURT OF THE STATE OF WASHINGTON FOR CLARK COUNTY

The Honorable Robert Lewis, Judge

APPELLANT'S OPENING BRIEF

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I.
ASSIGNMENTS OF ERROR

1. The evidence was insufficient to prove that Mr. Novick intentionally recorded private conversations. The trial court should have granted Mr. Novick's motion for arrest of judgment on that basis.

2. Mr. Novick should have been charged with only one count each of computer trespass and recording a private conversation because the unit of prosecution should cover the entire course of conduct.

II.
ISSUES PERTAINING TO ASSIGNMENTS OF ERROR

1. Was the evidence sufficient to support a conviction for intentionally recording a private conversation when the State could not produce any evidence that Mr. Novick executed a command to record audio?

2. The State charged Mr. Novick with eight counts of computer trespass in the first degree and eight counts of recording a private conversation. Did this violate the Double Jeopardy clause because the unit of prosecution should have covered the entire course of conduct?

III.
STATEMENT OF THE CASE

David Novick worked as an orthopedic trauma technician for Kaiser Permanente. 2B RP 592. In 2011 his wife Danielle Novick had an affair. 2B RP 578. Mr. Novick considered divorcing her, but ultimately the two of them agreed that they could both start seeing other people. The main condition was that that everything was in the open, including information on each other's cell phones. 2B RP 579-580. When Danielle found out that cell phones could track people, she thought that was a good idea and that would help build trust and safety. 2B RP 581. Around the beginning of 2012, they agreed to put software called Mobile Spy on all of their phones. 2B RP 581-82. That began in early 2012. 2B RP 582.

Mr. Novick viewed the software as essentially a "cloud" for all the data on the phone. When setting up the software, he clicked the boxes for every feature available. 2B RP 598. These included the option of obtaining audio and photographs from a remote phone. As far as Mr. Novick could tell these features acted randomly. He did not need to give any kind of command to receive data from his wife's phone. 2B RP 599. The program also served as a back-up for things like text messages. 2B RP 600. But Mobile Spy would only keep the data for a certain amount of time. *Id.* The text messages would come to him automatically about every hour

through an email. 2B RP 601. Mr. Novick was not sure how long it would take stored information to disappear but thought it was approximately a week. 2B RP 603. He never reconfigured the phones.

Mr. Novick testified that he met Lisa Maunu through a dating website in December 2013. 2B RP 604. Because Ms. Maunu's old cell phone was not working well, Mr. Novick lent her his phone. 2B RP 607. When Ms. Maunu was unable to obtain her own Verizon account Mr. Novick offered to put her on the account he shared with his wife. 2B RP 608. Mr. Novick ultimately gave Ms. Maunu his phone as a loan until she could get her own phone and account. 2B RP 610. Mobile Spy was still on the phone. *Id.* Mr. Novick obtained another phone for himself the next day. He promptly used "Google Play" to install all of the apps he had on his previous phone, including Mobile Spy. He set it up just like he used to. 2B RP 611. Then around March 11 or 12 Ms. Maunu was having trouble with the phone that Mr. Novick lent her so he lent her his new phone and bought another for himself. 2B RP 612. Again, he configured the phone with all his usual apps. 2B RP 613. He did not give much thought to having Mobile Spy on the phone he lent Ms. Maunu because he expected her to get her own phone soon. 2B RP 614. He was aware that Mobile Spy was sending him information from the phone in Ms. Maunu's possession, but for the most part he deleted that when it came in. 2B RP 614.

In her testimony Ms. Maunu agreed that her original phone was not working well. She maintained, however, that the Samsung Galaxy 4 phone that Mr. Novick ultimately gave her was a gift and not a loan. 1B RP 195-197, 202. Ms. Maunu became suspicious that something was wrong for two reasons: Mr. Novick seemed to know about things she had not yet told him and the phone started acting peculiarly. 1B RP 203-206; 211-213. On July 17, 2014, the phone completely stopped working. 1B RP 215. She then gave it back to Verizon. 1B RP 218-219.

Ms. Maunu ultimately contacted Kaiser with her suspicions that Mr. Novick was accessing her medical records. 1B RP 217-218. This led to an internal investigation by Daniel McManus and Robert Monsour, including a forensic review of computers Mr. Novick had access to. 1B RP 249-251. Mr. Monsour handled the forensic computer investigation. 1B RP 252-253. It turned out that Mr. Novick did not use Kaiser's system to access Maunu's records. But the investigation did reveal that Mr. Novick obtained information from Ms. Maunu's phone using Mobile Spy. 1B RP 259-260. Mr. McManus confirmed that Mr. Novick was using Mobile Spy as early as June 2013, long before he met Ms. Maunu. 1B RP 267-68.

Mr. Monsour testified that a Kaiser employee has to log in to use a Kaiser computer, and then log in again to access its "Health Connect" system. 2A RP 358-359. The user can store information on a local

computer or on his "P-Drive" (short for personal drive). The P-Drive is a folder on the server which allows a user to store information and then access it from any Kaiser computer. 2A RP 360. For purposes of this trial, Mr. Monsour focused on data on Mr. Novick's P-Drive on the dates of March 30, April 4, June 5, and June 6, 2014. 2A RP 387-388. Mr. Monsour identified several websites associated with Mobile Spy. 2A RP 384. The product had over a dozen features. 2A RP 397. Mr. Monsour learned that by the time of his investigation, Mobile Spy had removed two features: "surround recording" and "stealth camera." 2A RP 398.

All the charges in this case were based on the surround recording, which could cause a remote cell phone to turn on its audio recording feature. Mr. Monsour believed that a recording could take place only if the Mobile Spy user issued an affirmative command to record. 2A RP 414-420. As discussed in section IV(A) below, the basis for that conclusion was quite flimsy. Although there was evidence that Mobile Spy did send some audio files to Mr. Novick, he insisted that this happened randomly with no control on his part. Mr. Monsour conceded that he never found any trace of a command to record audio. 2B RP 476-77.

The State charged Mr. Novick with eight counts of computer trespass in the first degree and eight counts of recording a private

conversation. The element of intent to commit a crime elevated the trespass charges to first degree, a felony. CP 21-26. The only underlying crimes at issue were the counts of recording a private conversation, which are gross misdemeanors.

The jury convicted on all charges. CP 179-195. Mr. Novick was sentenced to 14 months on the trespass charges. The judge imposed 364 days on the recording charges, all of which were concurrent and suspended for 12 months. CP 211-225, 226-235.

IV.
ARGUMENT

A. THE EVIDENCE WAS INSUFFICIENT BECAUSE THERE WAS NO PROOF THAT MR. NOVICK INTENTIONALLY RECORDED PRIVATE CONVERSATIONS

1. Standard of Review

Evidence is sufficient to satisfy the federal due process clause if, when considered in the light most favorable to the prosecution, any rational trier of fact could have found the essential elements of the crime beyond a reasonable doubt. *Jackson v. Virginia*, 443 U.S. 307, 319, 99 S.Ct. 2781, 61 L.Ed.2d 560, *reh'g denied*, 444 U.S. 890, 100 S.Ct. 195, 62 L.Ed.2d 126 (1979). *Jackson* required the Washington Supreme Court to abandon its more deferential "substantial evidence" test. *State v. Green*, 94 Wn.2d 216, 616 P.2d 628 (1980). "[T]he application of the beyond-a-

reasonable-doubt standard to the evidence is not irretrievably committed to jury discretion." *Jackson*, 443 U.S. at 317 n.10. "A properly instructed jury may occasionally convict when it can be said that no rational trier of fact could find guilt beyond a reasonable doubt." *Id.* at 317.

When the entire case is based upon circumstantial evidence, "[t]he circumstantial evidence must be consistent with guilt and inconsistent with an hypothesis of innocence." *State v. Lung*, 70 Wn.2d 365, 372, 423 P.2d 72 (1967). *See also State v. Jackson*, 112 Wn.2d 867, 876, 774 P.2d 1211 (1989) ("An inference should not arise where there exist other reasonable conclusions that would follow from the circumstances.").

2. The Evidence is Insufficient in this Case Because There Was No Proof that Mr. Novick Issued a Command to Record a Private Conversation

The jury instructions in this case properly explained that Mr. Novick could be guilty of computer trespass in the first degree only if he *intentionally* gained access to a computer system without authorization, and only if he did so with the *intent* to commit another crime. *See e.g.* CP 129. The only computer system at issue was Ms. Maunu's cell phone (2C RP 773), and the only underlying crime at issue was intercepting or recording a private conversation (2C RP 756). In closing argument, the prosecutor maintained that Mr. Novick intentionally gained access to Ms. Maunu's cell phone by "sending the live command over Mobile Spy." 2C

RP 772. "That's the access." *Id.* The phone "wouldn't have recorded if not for that command." 2C RP 773.

> [W]hen you send a command you're communicating obviously with the computer and you're telling it what to do. When it does that you have accessed that computer . . . Was it intentional? You bet. You bet. He knew when he was going to those live control panels what he was doing.

2C RP 773.

> And when he made those audio recordings from the live control panel of that Mobile Spy software and sent that command to that phone, he was trespassing. And those are both crimes in Washington. The trespass and the intercepting of the private communication.

2C RP 756. The prosecutor maintained that Mr. Novick used the "live control panel" to send a specific command that would cause the phone to record audio. 2C RP 757. "That is a computer trespass. Sending a command into somebody else's phone." *Id.* The prosecutor emphasized that "[t]he access was sending the live command over Mobile Spy." 2C RP 772. "It wouldn't have recorded if not for that command." 2C RP 773.

This apparently persuasive argument had a fatal flaw: there was no evidence that Mr. Novick ever issued a command to record audio. In fact, in his rebuttal argument the prosecutor conceded that there was no direct evidence of such a command. 2C RP 838. He maintained, however, that

Mobile Spy's use of the phrase "live control panel" implied that audio could not be recorded without issuing a command. 2C RP 839.

The State's expert, Mr. Monsour, had no difficulty finding other commands Mr. Novick made through Mobile Spy. He explained that Mr. Novick used Google Chrome to send instructions to Mobile Spy through the internet. "Google Chrome keeps detailed records of any files that are downloaded by a user while they're using that program." 2A RP 370-71. The Mobile Spy website generates a

> very specific URL that the file came from up on the internet, and then the location it was saved to on the user's computer or P-Drive in our environment. And you can also tell the amount of data that was downloaded, whether the download was complete, and whether the file was opened immediately after it was downloaded.

2A RP 371. Monsour further explained that when Mr. Novick used the Kaiser computers, "we can pull logs that will show us in very minute detail what activities [Mr. Novick] did on the system." 2A RP 373. This includes the precise date and time of each activity. *Id.*

Yet, despite all of this information, Mr. Monsour never found a single instruction to direct Ms. Maunu's cell phone to make an audio recording, a text message, or a photograph. 2B RP 476-77. There was testimony that Mr. Novick downloaded such information from Mobile Spy's website to the P-Drive *after* it had been recorded. But that was

consistent with Mr. Novick's position that he had set this phone and all his phones to record all data automatically. Mr. Novick denied that he ever entered a command to record. 2B RP 626.

Mr. Monsour agreed that much of the data available from Mobile Spy could be automated, that is, it would continue to provide data with no further command. Mr. Monsour insisted, however, that the version of Mobile Spy used by Mr. Novick during the relevant time periods required a specific command to record audio. But that was based on a flimsy premise. Because Ms. Maunu got rid of the cell phone at issue, it could not be examined to determine what commands had been sent to it. 2B RP 482. Further, by the time Mr. Monsour began his investigation, Mobile Spy had changed from version 6.5 to 7.0 and had removed the ability to record sound. 2B RP 480. In an effort to gain information about the former product, Mr. Monsour had a web chat with a technical support representative, but he had no idea what qualifications this person had or how long he had been with the company. 2B RP 481. In fact, Mr. Monsour acknowledged that at least some of the information provided by the support person was likely erroneous. 2B RP 511. Further, although the representative typed that "you have to start [the recording feature] manually" it was not clear whether he was referring to the initial set-up or to each time a recording was made. *Id.* at 499.

Mr. Monsour also viewed an online demo, but it was not specific to version 6.5. 2B RP 478-479. He also reviewed unspecified documents he found on the internet. 2B RP 481.

Although there was no sign of Mr. Novick making a command to record a conversation, Mr. Monsour said that might not show up because some websites do not create a new URL for each command. But he had no idea whether Mobile Spy's website worked that way with the surround recording feature. 2B RP 507-511.

Mr. Novick filed an unsuccessful motion for arrest of judgment, arguing that the evidence was insufficient to convict. The motion should have been granted. On these facts, no rational factfinder could find proof beyond a reasonable doubt. The State could not disprove Mr. Novick's testimony that he simply checked all the boxes on the software to allow it to gather all data automatically. The State could not find any command to record audio. That there might have been undetected commands was mere speculation.

As Mr. Novick noted in his motion for arrest of judgment, burglary case law provides a helpful analogy. "Mere possession of stolen goods, unaccompanied by other evidence of guilt, is not prima facie evidence of burglary; but the rule is otherwise where there is indicatory evidence on collateral matters." *State v. Garske*, 74 Wn.2d 901, 903, 447 P.2d 167, 168

(1968). "The reason for the rule is more evident when such possession is established by inference or circumstantial evidence." *State v. Mace*, 97 Wn.2d 840, 843, 650 P.2d 217, 219 (1982). In *Mace*, there was clear evidence of a burglary and the defendant clearly possessed the stolen property in a nearby town only a few hours after the burglary. *Id.* at 841-42. Nevertheless, the Supreme Court found the evidence insufficient that Mr. Mace was the burglar. *Id.* at 843.

Similarly, in this case, there was no direct evidence that Mr. Novick intentionally recorded a private conversation and any circumstantial evidence was quite weak. Mr. Novick was the only witness who had actually used the software and his claim that all features were set to work automatically was plausible. The mere fact that the audio ended up on Mr. Novick's P-Drive did not prove beyond a reasonable doubt that he intentionally recorded the audio.

B. IN THE ALTERNATIVE, MR. NOVICK SHOULD HAVE BEEN CHARGED WITH ONLY ONE COUNT EACH OF COMPUTER TRESPASS AND INTERCEPTING CONVERSATIONS BECAUSE THE CORRECT UNIT OF PROSECUTION COVERS THE ENTIRE COURSE OF CONDUCT

1. Legal Standards

The correct units of prosecution for computer trespass and recording private conversations appear to be matters of first impression.

The applicable principles of statutory construction compel a finding that only one crime of each type was committed here.

"One aspect of double jeopardy protects a defendant from being punished multiple times for the same offense." *State v. Adel*, 136 Wn.2d 629, 632, 965 P.2d 1072, 1073 (1998). That protection is violated when a defendant is convicted on more counts than the unit of prosecution allows. *Id.* In *Adel*, as here, the defendant did not raise the double jeopardy issue at trial, but the constitutional challenge may be raised for the first time on appeal. *Id.* at 631-32. This Court should therefore review the issue.

The Washington Supreme Court set out the test for unit of prosecution most recently in *State v. Hall*, 168 Wn.2d 726, 729, 230 P.3d 1048, 1050 (2010). The first step is to analyze the statute in question. The Court then reviews the statute's history. "Finally we perform a factual analysis as to the unit of prosecution because even where the legislature has expressed its view on the unit of prosecution, the facts in a particular case may reveal more than one unit of prosecution is present." *Id.*[1] If the legislature "fails to define the unit of prosecution or its intent is unclear, under the rule of lenity any ambiguity must be resolved against turning a

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[1] Citations and internal quotation marks omitted.

single transaction into multiple offenses." *Id.*[2] *See also*, *Bell v. United States*, 349 U.S. 81, 84, 75 S.Ct. 620, 99 L.Ed. 905 (1955). The standard of review is de novo. *State v. Ose*, 156 Wn.2d 140, 144, 124 P.3d 635, 636 (2005).

2. The Computer Trespass Statute

RCW 9A.52.110 reads in relevant part:

> **Computer trespass in the first degree.**
>
> A person is guilty of computer trespass in the first degree if the person, without authorization, intentionally gains access to a computer system or electronic database of another; and (a) The access is made with the intent to commit another crime.

On its face, the statute does not define the unit of prosecution. The Washington Supreme Court, however, has emphasized that a statute's use of the definite article may shed light on the issue. *Ose*, 156 Wn.2d at 146-48. In *Ose*, the statute prohibited possession of "**a** stolen access device." (Emphasis added). The Court therefore concluded that the unit of prosecution was each stolen access device. *Id.* at 148. Similarly, in *State v. Graham*, 153 Wn.2d 400, 404, 103 P.3d 1238 (2005), the reckless endangerment statute required endangering "another." The Court considered "another" to be equivalent to the definite article when referring

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[2] Citations and internal quotation marks omitted.

to a person, and therefore concluded that the unit of prosecution was each person endangered.

The computer trespass statute uses both of these words. The person must gain access to "a" computer system or electronic database[3], and that computer must belong to "another." This suggests that there is a unit of prosecution for each computer trespassed upon and perhaps for each person to whom the computer belonged. Had the legislature intended each *trespass* to be a separate crime, however, it could have used different language, such as: "A person commits **a** computer trespass in the first degree if . . ." In this case the only computer at issue was the Galaxy 4 cell phone in Ms. Maunu's possession, and she testified that it belonged only to her. 1B RP 195-197, 202. Thus, on the facts of this case, the statutory language favors a single unit of prosecution.

The history of the statute does not shed any further light on this issue. The statute was enacted in 1984 and has never been amended. The legislative history does not include any discussion of the unit of prosecution.

However, in an analogous setting, a single unit of prosecution has been found to apply. In *Hall*, *supra*, the defendant was charged with four

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[3] For brevity, the statutory phrase "computer system or electronic database" will be referred to as "computer."

counts of witness tampering after he called the witness over 1,200 times in an effort to dissuade her from testifying against him. *Id.* at 729. The Court noted that a unit of prosecution can be either an act or a "course of conduct." *Id.* at 731. This analysis goes back over 100 years. *See Hall*, 168 Wn.2d at 731, citing *Ex parte Snow*, 120 U.S. 274, 286, 7 S.Ct. 556, 30 L.Ed. 658 (1887) (bigamy is a single, ongoing offense). In *Hall*, "the course of conduct was continuous and ongoing, aimed at the same person, in an attempt to tamper with her testimony at a single proceeding." *Id.* at 736. The Court therefore found that the "offense is complete as soon as a defendant attempts to induce another not to testify or to testify falsely, whether it takes 30 seconds, 30 minutes, or days." *Id.* at 731. The defendant's crime may be considered a continuing course of conduct even if the legislature does not specifically use such terms in the statute. *Id.* at 733.

The same reasoning applies here. Mr. Novick was convicted of engaging in a single course of conduct with the single objective to spy on a single person's cell phone. He therefore committed only one count of computer trespass.

The State's position at trial that every unauthorized contact with a computer could be charged as a separate crime would lead to absurd results, contrary to the rules of statutory interpretation. *See Tingey v.*

Haisch, 159 Wn.2d 652, 663-64, 152 P.3d 1020 (2007). All (or in the State's view most) of the trespasses were automated. Mobile Spy sent out information from Ms. Maunu's cell phone thousands of times within a few months. There were over 8,000 records involving the Mobile Spy websites, including at least 500 audio recordings. 2A RP 385. That is the nature of using computers to gather information. Once an automated program finds its way into an unauthorized computer, it can continue to access information indefinitely and at great speed. The legislature could not have intended to punish every access.

Thus, under our Supreme Court's rules of statutory construction, Mr. Novick clearly should have been charged with only one count of computer trespass. In the alternative, if this Court finds that the unit of prosecution is unclear, it must nevertheless accept Mr. Novick's position under the rule of lenity.

3. Intercepting or Recording Private Conversations; RCW 9.73.030

The analysis for this statute is similar to that for the Computer Trespass charges. Again, the unit of prosecution is an issue of first impression. The statute reads in relevant part:

> (1) Except as otherwise provided in this chapter, it shall be unlawful for any individual, partnership, corporation, association, or the state of Washington, its agencies, and political subdivisions to intercept, or record **any**: . . .

> (b) Private conversation, by any device electronic or otherwise designed to record or transmit such conversation regardless how the device is powered or actuated without first obtaining the consent of all the persons engaged in the conversation.

(Emphasis added). The word "any" has several meanings, but none of them are restricted to the singular. The most natural meaning of the word in this context is "one or more – used to indicate an undetermined number or amount." *Merriam-Webster online dictionary.*[4] Had the legislature intended the unit of prosecution to be each conversation, it would have used the definite article "a."

The history of the statute is not helpful. The statute was first enacted in 1967 and there have been some minor changes since then, but none that shed light on the unit of prosecution.

As with the witness tampering charges addressed in *Hall*, and the computer trespass charges discussed above, the violation of RCW 9.73.030 should be treated as a continuing course of conduct, at least on the facts of this case. Assuming that the State's theory of the case is correct, recording conversations was just one aspect of Mr. Novick's single objective to continuously spy on Ms. Maunu. Over 400 audio recordings were involved. 2A RP 321. Again, even if the legislature's

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[4] http://www.merriam-webster.com/dictionary/any

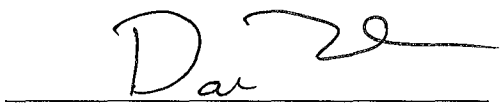
intent is not clear, the rule of lenity requires this Court to accept Mr. Novick's position.

V.
CONCLUSION

This Court should find the evidence insufficient and overturn all the convictions. In the alternative, it should find that only two crimes were committed, in view of the proper unit of prosecution.

DATED this 4th day of December, 2015.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that on the date listed below, I served by email where applicable and by First Class United States Mail, postage prepaid, one copy of this brief on the following:

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12/04/2015
Date

Peyush Soni

No. 47688-6-II
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APPENDIX TO APPELLANT'S OPENING BRIEF

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RCW 9A.52.110

Computer trespass in the first degree.

(1) A person is guilty of computer trespass in the first degree if the person, without authorization, intentionally gains access to a computer system or electronic database of another; and

(a) The access is made with the intent to commit another crime; or

(b) The violation involves a computer or database maintained by a government agency.

(2) Computer trespass in the first degree is a class C felony.

[1984 c 273 § 1.]

RCW 9.73.030

Intercepting, recording, or divulging private communication—Consent required—Exceptions.

(1) Except as otherwise provided in this chapter, it shall be unlawful for any individual, partnership, corporation, association, or the state of Washington, its agencies, and political subdivisions to intercept, or record any:

(a) Private communication transmitted by telephone, telegraph, radio, or other device between two or more individuals between points within or without the state by any device electronic or otherwise designed to record and/or transmit said communication regardless how such device is powered or actuated, without first obtaining the consent of all the participants in the communication;

(b) Private conversation, by any device electronic or otherwise designed to record or transmit such conversation regardless how the device is powered or actuated without first obtaining the consent of all the persons engaged in the conversation.

(2) Notwithstanding subsection (1) of this section, wire communications or conversations (a) of an emergency nature, such as the reporting of a fire, medical emergency, crime, or disaster, or (b) which convey threats of extortion, blackmail, bodily harm, or other unlawful requests or demands, or (c) which occur anonymously or repeatedly or at an extremely inconvenient hour, or (d) which relate to communications by a hostage holder or barricaded person as defined in RCW **70.85.100**, whether or not conversation ensues, may be recorded with the consent of one party to the conversation.

(3) Where consent by all parties is needed pursuant to this chapter, consent shall be considered obtained whenever one party has announced to all other parties engaged in the communication or conversation, in any reasonably effective manner, that such communication or conversation is about to be recorded or transmitted: PROVIDED, That if the conversation is to be recorded that said announcement shall also be recorded.

(4) An employee of any regularly published newspaper, magazine, wire service, radio station, or television station acting in the course of bona fide news gathering duties on a full-time or contractual or part-time basis, shall be deemed to have consent to record and divulge communications or conversations otherwise prohibited by this

chapter if the consent is expressly given or if the recording or transmitting device is readily apparent or obvious to the speakers. Withdrawal of the consent after the communication has been made shall not prohibit any such employee of a newspaper, magazine, wire service, or radio or television station from divulging the communication or conversation.

[1986 c 38 § 1; 1985 c 260 § 2; 1977 ex.s. c 363 § 1; 1967 ex.s. c 93 § 1.]

NOTES:

Reviser's note: This section was amended by 1985 c 260 § 2 and by 1986 c 38 § 1, each without reference to the other. Both amendments are incorporated in the publication of this section under RCW **1.12.025**(2). For rule of construction, see RCW **1.12.025**(1).

Severability—1967 ex.s. c 93: "If any provision of this act, or its application to any person or circumstance is held invalid, the remainder of the act, or the application of the provision to other persons or circumstances is not affected." [1967 ex.s. c 93 § 7.]

DAVID ZUCKERMAN LAW OFFICE

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Cost Bill

Objection to Cost Bill

Affidavit

Letter

Copy of Verbatim Report of Proceedings - No. of Volumes: ____
Hearing Date(s): _____

Personal Restraint Petition (PRP)

Response to Personal Restraint Petition

Reply to Response to Personal Restraint Petition

Petition for Review (PRV)

Other: _____

Comments:

Appellant's Opening Brief

Sender Name: David Zuckerman - Email: peyush@davidzuckermanlaw.com