Case No. 93872-5

THE SUPREME COURT OF THE STATE OF WASHINGTON

D. RYAN PATRICK, et. al.,

Appellants,

VS.

WELLS FARGO BANK, N.A., et. al.

Respondents.

ANSWER TO PETITION FOR REVIEW BY RESPONDENTS QUALITY LOAN SERVICE CORP. OF WASHINGTON, QUALITY LOAN SERVICE CORP., and McCARTHY & HOLTHUS, LLP

Joseph Ward McIntosh, WSBA #39470
McCarthy & Holthus, LLP
108 1st Ave S, Ste 300
Seattle, WA 98104
206-319-9049
jmcintosh@mccarthyholthus.com

Attorney for Respondents Quality Loan Service Corp. of Washington; Quality Loan Service Corp.; McCarthy & Holthus, LLP

WA-15-664704-APP



I. RESPONSE

The Petition does not identify any error in the Opinion with respect to the dismissals of Quality Loan Service Corp. of Washington, Quality Loan Service Corp., and McCarthy & Holthus, LLP ("Respondents"). For reasons discussed in the briefing by Respondents, and in the Opinion, the foreclosure of the encumbered property was advanced pursuant to the law in all respects. There was no defect in the foreclosure justifying relief against Respondents, irrespective of whether waiver applies or not. The dismissal of Respondents was properly affirmed. Review should be denied as to the dismissal of Respondents.

Dated: December 21, 2016

MCCARTHY & HOLTHUS, LLP

Joseph Ward McIntosh, WSBA # 39470

Attorneys for Quality Loan Service Corp. of Washington; Quality

Loan Service Corp.; McCarthy & Holthus, LLP