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NO. 76201-0-I
COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION 1

HISHM CHONAH,

Respondent / Plaintiff,

v.

COASTAL VILLAGES POLLOCK, LLC and
C/P NORTHERN HAWK, LLC,
Petitioners / Defendants.

OPPOSITION TO DISCRETIONARY REVIEW

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1. Introduction

Coastal Villages bases its arguments on a logical fallacy: appellate courts have affirmed the discretion of trial courts to impose estoppel when the three factors laid out in New Hampshire and Arkison are present; therefore, if the three factors are present the trial court must apply estoppel.

This fallacy allows Coastal Villages to ignore the clear guidance of the U.S. and Washington State Supreme Courts: the three factors are not an exhaustive formula, and additional considerations may guide a court's decision about whether estoppel is appropriate. New Hampshire v. Maine, 532 U.S. 742, 751 (2001); Arkison v. Ethan Allen, 160 Wn.2d 535, 539 (2007).

The Court of Appeals decision is consistent with the purposes of judicial estoppel and the guidance of New Hampshire and Arkison in holding the “trial court’s analysis was entirely appropriate in light of the flexible, fact-based nature of the equitable doctrine of judicial estoppel.”

2. Statement of the case

Hishm Chonah immigrated from Sudan in 2001 with an accounting certificate from a school in Sudan but his English was

too poor for him to make use of it, and he took a fishing job.

Appendix pp 1-2. After his injury Coastal Villages paid him maintenance under the maritime Jones Act, first at \$25 per day and then at \$45 per day. He could not meet his living expenses on \$775 - \$1395 a month and got farther and farther into debt. When one of his creditors froze his checking account he talked to people at the bank, and they suggested he contact an attorney. Id. at 6-7.

He found Brad Puffpaff, a sole practitioner who had been admitted to practice less than a year earlier. The two talked about the accident and the maintenance payments and surgeries. Chonah told him he didn't need a lawyer for the injury case because his employer was treating him well. He told him that once the surgeries were done they would stop paying him maintenance, and they would pay him for his lost time and loss of future wages. Id. at 4. Puffpaff gave Chonah a questionnaire to fill out but he could not understand it, so the two met again and Puffpaff filled out the form for him. Id. at 3.

The transcript of the interview with the bankruptcy trustee makes it clear that Chonah did not understand what the term "claim" meant, and that he thought the trustee was asking if he had a current lawsuit with any party:

Q. Do you remember going to that meeting [of creditors]?

A. Yes, sure.

Q. And Brad was there too?

A. We meet outside and we go in there together.

Q. And so was he inside with you?

A. Yes.

Q. Do you remember what questions you were asked at that meeting?

A. It wasn't many questions, but they ask you if you are telling the truth, and everything is right, but exactly the questions -- they asked a couple questions, it wasn't many.

Q. Did they ask you anything about your injury claim?

A. The way they asked me, like I'm going to try to say it, but it's not exactly -- I don't remember the words exactly. He asked me did you have another like Court -- I mean like issue in the Court or something, something like that, and I asked him no, because I wasn't have a claim against somebody or somebody have against me or something, just only that I have that, so I said no, I think. But exactly the question, I wasn't remember.

At that time I don't understand what is going on me is the case. It was an injury and it will be okay and that's it. That's how I it, you know.

Id. at 5.

Puffpaff was with Chonah when the trustee interviewed him, and did not correct his answer about an injury claim. Puffpaff had mistakenly listed Chonah's income as "L&I workman's compensation--\$1395" rather than as maintenance payments under the Jones Act. Id. at 9. (\$45.00 per day times 31 days is \$1395.) Workers receiving disability income under Washington's L&I cannot

sue their employers for an on-the job injury, and disability payments have a blanket exemption under the bankruptcy code:

The following property may be exempted under subsection (b)(2) of this section:

-
- (10) The debtor's right to receive-
- (A) a social security benefit, unemployment compensation, or a local public assistance benefit;
 - (B) a veterans' benefit;
 - (C) a disability, illness, or unemployment benefit;

11 U.S.C. § 522(d). Puffpaff did not have enough experience to differentiate a Jones Act claim from an L&I claim, he did not list a personal injury claim in the bankruptcy schedules, and he did not correct Chonah's testimony at the meeting of creditors.

3. Argument

a. No case law holds that a trial court may not consider intent

This case is procedurally distinct from every case either party has cited; in none of these cases did a defendant appeal a trial court's decision to not impose estoppel. The cases have a common procedural stance. A plaintiff/appellant asks for the reversal of judicial estoppel because the trial court did not consider intent. The

appellate court holds that intent is not a necessary element because the guidance of New Hampshire is permissive: considerations in addition to the three factors **may** guide a court's decision and application of the doctrine **may** be inappropriate when a party's prior position was based on inadvertence or mistake. The appellate court then holds that intent is not a necessary element of the three-factor analysis and affirms the discretion of the trial court to apply estoppel.

The cases hold that the trial court is not required to make an express finding about the debtor's intent. But they do not support an argument that courts **may not** consider intent or other circumstances in addition to the three factors. For example, in discussing an Eleventh Circuit case the Cunningham Court acknowledged that intent was relevant, writing "While noting that judicial estoppel might not apply in cases of simple error or 'inadvertence', the court also observed that 'deliberate or intentional manipulation can be inferred from the record.'" Cunningham v. Reliable Concrete Pumping, 126 Wn.App. 222, 234 (2005).

The Court of Appeals made no error when it recognized, as a matter of comity, the express finding of the Bankruptcy Court that Chonah did not intentionally conceal his maritime claim in his original bankruptcy filing. The trial court exercised its discretion well

within the strictures of New Hampshire and Arkison when it decided that judicial estoppel was not appropriate because Chonah's failure to disclose his claim was inadvertent.

b. Trial courts are not bound to apply judicial estoppel whenever the three New Hampshire factors are present

Judicial estoppel is invoked to protect the integrity of the judicial process by "prohibiting parties from deliberately changing positions according to the exigencies of the moment." New Hampshire at 750. In the bankruptcy context the doctrine serves to encourage full disclosure, and "creditors and bankruptcy courts rely on the accuracy of disclosure statements." Cunningham v. Reliable Concrete Pumping, 126 Wn.App. 222 (2005), footnote 10.

Given the purposes of the doctrine it makes no sense to argue a court cannot consider all the circumstances of the case, and in particular whether a debtor intentionally hid a claim. When debtors make unintentional mistakes they are not affronting the integrity of the courts, and applying estoppel against mistaken debtors does nothing to encourage compliance with bankruptcy disclosure requirements.

Costal Villages attempts to shackle the discretion inherent in equity when it argues that courts “may not consider factors which have been expressly deemed irrelevant to the judicial estoppel analysis.” No published case has deemed any factor irrelevant. The guidance in New Hampshire and Arkison is permissive and open-ended, that the three factors are not an exhaustive formula and additional considerations may guide a court's decision.

The trial court was following this guidance when it weighed additional circumstances including “quirks of maritime and bankruptcy law” and “language and cultural barriers”.

5. CONCLUSION

Coastal Villages has not articulated how the purposes of judicial estoppel would be served by imposing it in this case. No matter how strong Chonah’s Jones Act case might be or how clear his innocence in omitting the claim from his bankruptcy filing, he would be denied his day in court, the alleged wrongdoer would avoid all liability, and his creditors in bankruptcy would recover nothing. The very purpose of the doctrine of judicial estoppel, protecting the integrity of the judicial process, would be thwarted.

Coastal Villages has not cited any case law that supports its position that the trial court was mistaken when it weighed language and cultural barriers, quirks of maritime and bankruptcy law, and questionable legal advice.

When it argues that the trial court must impose estoppel in a mechanical manner whenever the three factors in New Hampshire are present it distorts the purpose of the doctrine. "Because the rule is intended to prevent the improper use of judicial machinery, judicial estoppel is an equitable doctrine invoked by a court at its discretion." New Hampshire at 750 (internal quotation marks and citation omitted).

Hishm Chonah requests that this Court deny review.

Dated November 19, 2018

Michael Healy, WSBA #33756
Attorney for Respondent Hishm Chonah

NO. 76201-0-I

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Petitioners / Defendants.

CERTIFICATE OF SERVICE

I certify that on November 19, 2018, I served via e-service a true and correct copy of the Opposition to Discretionary Review on the following entities:

The Court of Appeals for the State of Washington, Division I
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Michael Barcott and Daniel Barcott
Holmes Weddle & Barcott
999 3rd Ave, Suite 2600
Seattle, WA 98104

Date November 19, 2018

/s/ Michael Healy

1	A. September 15.	10:33
2	Q. Where were you born?	10:33
3	A. Sudan.	10:33
4	Q. When did you come to the U.S.?	10:33
5	A. 2001.	10:33
6	Q. What caused you to come to the U.S.?	10:33
7	A. How I come, you mean?	10:33
8	Q. Why you came.	10:33
9	A. The reason I came here was to live here and study	10:33
10	here, that was the reason.	10:34
11	Q. Was there anything going on in Sudan? Was there	10:34
12	fighting there or anything like that that caused you to move out	10:34
13	of Sudan?	10:34
14	A. No, just looking for a better life.	10:34
15	Q. Do you have family in Sudan?	10:34
16	A. Yes.	10:34
17	Q. What family members do you have in Sudan, immediate	10:34
18	family?	10:34
19	A. All of them. My dad, mom, brother and sister, all of	10:34
20	them here.	10:34
21	Q. How many brothers and sisters?	10:34
22	A. I have seven brothers and one sister.	10:34
23	Q. Are you the only member of your immediate family that	10:34
24	is living in the U.S.?	10:34
25	A. Yes.	10:34

1 Q. How many students in that university? 10:40

2 A. It's a big university. I don't know how many. 10:40

3 Q. Like ten, 20, 30,000? 10:40

4 A. It could be that. It could be more. I'm not sure 10:40

5 exactly. It's getting bigger right now. 10:41

6 Q. And you graduated with a specialty in accounting? 10:41

7 A. Yeah. 10:41

8 Q. When you came to the U.S. did you ever consider going 10:41

9 into accounting here? 10:41

10 A. That was the first thing I think about, but it doesn't 10:41

11 happen. 10:41

12 Q. How come? 10:41

13 A. Well, first I need to study the English language and 10:41

14 then I need to go to school and at the same time I need to make 10:41

15 money to help -- I have family back there, so it became hard. 10:41

16 And then I go to fishing and the more I get income, the more 10:41

17 they need money, you know, that's how life is, so it just became 10:41

18 that way. 10:41

19 Q. I'm familiar with that. Have you had any education in 10:41

20 the U.S. at all? 10:41

21 A. Just a couple classes here and there, but not really. 10:41

22 Did I go to college or something? No. When I was in American 10:41

23 Seafood I had ESL once, something like that, I believe. 10:41

24 Q. How is your English ability now compared to three 10:42

25 years ago? About the same? 10:42

1 of the unique posture of this case. 11:21

2 MR. BARCOTT: I was going to just ask you to do that 11:21

3 because those conversations are just so central to where we are. 11:21

4 MR. MERRIAM: Yeah, I know. I'll waive it will say we 11:21

5 can reimpose it at any time. 11:21

6 (Marked Deposition Exhibit 2). 11:21

7 Q. This is the paper that was filed in the bankruptcy 11:22

8 court that started the process of reopening your bankruptcy and 11:22

9 later converting. This is a paper signed by the lawyers. There 11:22

10 are certain things that I want to find out if they are accurate 11:22

11 in this paper or not accurate in this paper. 11:22

12 Go to page 3, please. Going to line 4, at the end of 11:22

13 line 4 there is a sentence that begins "He gave Chonah a 11:22

14 questionnaire to take home and fill out." 11:22

15 A. Hold on. Which line? 11:23

16 Q. Three down. It starts "He gave." 11:23

17 A. Number 2 or number 3? 11:23

18 Q. It's between 3 and 4. 11:23

19 A. "He gave," yeah -- 11:23

20 Q. -- Chonah a questionnaire to take home and fill out, 11:23

21 but Chonah's English was not good enough to understand the 11:23

22 questions so Puffpaff completed it at a second interview." 11:23

23 So Puffpaff completed it at the second interview. 11:23

24 That's just what you told me about a few minutes ago, right? 11:23

25 A. Yes. 11:23

1 Q. "Chonah told Puffpaff he expected to receive a payment 11:23
2 from Coastal Villages for the wages he had lost and for his loss 11:23
3 of future wages. He said he expected the payment once his 11:23
4 surgeries were completed and the maintenance payments stopped, 11:23
5 and was concerned that he might need an attorney if Coastal 11:23
6 Villages offered too little." 11:24
7 A. Yes. 11:24
8 Q. You told Mr. Puffpaff that you would get some money 11:24
9 from Coastal Villages after your maintenance stopped? 11:24
10 A. Yes. 11:24
11 Q. And once again, Mr. Puffpaff didn't tell you anything 11:24
12 about how that might impact your bankruptcy? 11:24
13 A. No. 11:24
14 Q. Do you own a home? 11:24
15 A. No. 11:24
16 Q. Have you ever owned a home? 11:24
17 A. My family used to have one, but no, like me. 11:24
18 Q. Have you rented a place to live for the last five 11:24
19 years? 11:24
20 A. Yeah. Yeah, I'm renting still the same. 11:24
21 Q. Go to page 4 of this paper, please. 11:24
22 A. Excuse me. Do you mind if I stand up? 11:25
23 Q. Do you want to keep going? 11:25
24 A. No, I'm fine. 11:25
25 Q. Go to line 13. This paper says, "His inexperienced 11:25

1 A. Yes, right. 11:50

2 Q. Do you remember going to that meeting? 11:50

3 A. Yes, sure. 11:50

4 Q. And Brad was there too? 11:50

5 A. We meet outside and we go in there together. 11:50

6 Q. And so was he inside with you? 11:50

7 A. Yes. 11:50

8 Q. Do you remember what questions you were asked at that 11:50

9 meeting? 11:50

10 A. It wasn't many questions, but they ask you if you are 11:50

11 telling the truth, and everything is right, but exactly the 11:50

12 questions -- they asked a couple questions, it wasn't many. 11:50

13 Q. Did they ask you anything about your injury claim? 11:50

14 A. The way they asked me, like I'm going to try to say 11:50

15 it, but it's not exactly -- I don't remember the words exactly. 11:51

16 He asked me did you have another like Court -- I mean like issue 11:51

17 in the Court or something, something like that, and I asked him 11:51

18 no, because I wasn't have a claim against somebody or somebody 11:51

19 have against me or something, just only that I have that, so I 11:51

20 said no, I think. But exactly the question, I wasn't remember. 11:51

21 At that time I don't understand what is going on me is 11:51

22 the case. It was an injury and it will be okay and that's it. 11:51

23 That's how I it, you know. 11:51

24 (Marked Deposition Exhibit 6.) 11:51

25 Q. Mr. Chonah, Exhibit 6 is the order of the bankruptcy 11:52

1 Q. Right. It was American Seafoods in 2001? 11:02

2 A. Yes. 11:02

3 Q. Okay. Is there anything else in paragraph 1 that is 11:02

4 not accurate? 11:02

5 A. Yes, it's fine. 11:02

6 Q. Everything else is accurate? Yes? 11:02

7 A. Yes. 11:02

8 Q. So the very next paragraph starts off "In December 11:02

9 2013 my bank account was frozen and I went to see an attorney, 11:02

10 Brad Puffpaff." 11:02

11 Do you see that? 11:02

12 A. Yes. 11:03

13 Q. Is that true, was your bank account frozen in December 11:03

14 2013? 11:03

15 A. I'm not sure of the month, but I think that's true. 11:03

16 Q. Around that time was your bank account frozen? 11:03

17 A. I think so. 11:03

18 Q. How did you learn your bank account was frozen? 11:03

19 A. Well, I went one time to my account and there was no 11:03

20 money there and it showed me zero there and I was -- I didn't 11:03

21 know what was going on, and then I checked like my -- like my -- 11:03

22 what do they call that? -- like my mail and I found out they 11:03

23 sent me something like that and I couldn't understand what it 11:03

24 means. 11:03

25 So I asked the bank when I see the zero there and I'm 11:03

1 sure there is money there, and they check with me and they tell 11:03
2 me we don't know what's going on, you can talk to your attorney 11:03
3 or something, so I found out something was going on. 11:03
4 Q. When you were told who it was, which of your creditors 11:03
5 had taken the funds out of your account? 11:04
6 A. I don't remember. Nobody take nothing. They just 11:04
7 freeze it. 11:04
8 Q. Do you know who it was, who froze it? 11:04
9 A. I'm not sure. 11:04
10 Q. You saw attorney Brad Puffpaff. How did you find that 11:04
11 attorney? 11:04
12 A. I called one lawyer, I know him, like I have him 11:04
13 (inaudible), so I called his office and they don't do this, and 11:04
14 they give me some other guy and I call, but he say no, too. So 11:04
15 then I just go on-line and found someone and I called and they 11:04
16 give me his office. I don't know what they call that 11:04
17 connection. 11:04
18 So I called his office -- I called somebody else and 11:04
19 they said no, I'm not doing this, but here, I will give you a 11:04
20 transfer to my worker in the same office, you can do that, so 11:04
21 that's how I found him. 11:04
22 Q. So that was Brad who you got transferred to in the 11:04
23 same office? 11:05
24 A. Yes. 11:05
25 Q. The next sentence of the declaration, it says, "He and 11:05

Fill in this information to identify your case:

Debtor 1	<u>Hishm</u>	<u>Chonah</u>
	First Name	Last Name
Debtor 2 (Spouse, if filing)		
	First Name	Last Name
United States Bankruptcy Court for the:	<u>WESTERN DISTRICT OF WASHINGTON</u>	
Case number (if known)		

Check if this is:

- An amended filing
- A supplement showing post-petition chapter 13 income as of the following date:

MM / DD / YYYY

Official Form B 6I

Schedule I: Your Income

12/13

Be as complete and accurate as possible. If two married people are filing together (Debtor 1 and Debtor 2), both are equally responsible for supplying correct information. If you are married and not filing jointly, and your spouse is living with you, include information about your spouse. If you are separated and your spouse is not filing with you, do not include information about your spouse. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

Part 1: Describe Employment

1. Fill in your employment information.

If you have more than one job, attach a separate page with information about additional employers.

Include part-time, seasonal, or self-employed work.

Occupation may include student or homemaker, if it applies.

	Debtor 1	Debtor 2 or non-filing spouse
Employment status	<input type="checkbox"/> Employed <input checked="" type="checkbox"/> Not employed	<input type="checkbox"/> Employed <input type="checkbox"/> Not employed
Occupation	<u>Unemployed</u>	
Employer's name		
Employer's address	Number Street	Number Street
	City State Zip Code	City State Zip Code
How long employed there?		

Part 2: Give Details About Monthly Income

Estimate monthly income as of the date you file this form. If you have nothing to report for any line, write \$0 in the space. Include your non-filing spouse unless you are separated.

If you or your non-filing spouse have more than one employer, combine the information for all employers for that person on the lines below. If you need more space, attach a separate sheet to this form.

	For Debtor 1	For Debtor 2 or non-filing spouse
2. List monthly gross wages, salary, and commissions (before all payroll deductions). If not paid monthly, calculate what the monthly wage would be.	2. <u>\$0.00</u>	
3. Estimate and list monthly overtime pay.	3. + <u>\$0.00</u>	
4. Calculate gross income. Add line 2 + line 3.	4. <u>\$0.00</u>	

Debtor 1 **Hishm** **Chonah** Case number (if known) _____
 First Name Middle Name Last Name

	For Debtor 1		For Debtor 2 or non-filing spouse
Copy line 4 here → 4.	<u>\$0.00</u>		
5. List all payroll deductions:			
5a. Tax, Medicare, and Social Security deductions	5a. <u>\$0.00</u>		
5b. Mandatory contributions for retirement plans	5b. <u>\$0.00</u>		
5c. Voluntary contributions for retirement plans	5c. <u>\$0.00</u>		
5d. Required repayments of retirement fund loans	5d. <u>\$0.00</u>		
5e. Insurance	5e. <u>\$0.00</u>		
5f. Domestic support obligations	5f. <u>\$0.00</u>		
5g. Union dues	5g. <u>\$0.00</u>		
5h. Other deductions. Specify: _____	5h. + <u>\$0.00</u>		
6. Add the payroll deductions. Add lines 5a + 5b + 5c + 5d + 5e + 5f + 5g + 5h.	6. <u>\$0.00</u>		
7. Calculate total monthly take-home pay. Subtract line 6 from line 4.	7. <u>\$0.00</u>		
8. List all other income regularly received:			
8a. Net income from rental property and from operating a business, profession, or farm Attach a statement for each property and business showing gross receipts, ordinary and necessary business expenses, and the total monthly net income.	8a. <u>\$0.00</u>		
8b. Interest and dividends	8b. <u>\$0.00</u>		
8c. Family support payments that you, a non-filing spouse, or a dependent regularly receive Include alimony, spousal support, child support, maintenance, divorce settlement, and property settlement.	8c. <u>\$0.00</u>		
8d. Unemployment compensation	8d. <u>\$0.00</u>		
8e. Social Security	8e. <u>\$0.00</u>		
8f. Other government assistance that you regularly receive Include cash assistance and the value (if known) or any non-cash assistance that you receive, such as food stamps (benefits under the Supplemental Nutrition Assistance Program) or housing subsidies. Specify: <u>L&I WORKMAN'S COMPENSATION</u>	8f. <u>\$1,395.00</u>		
8g. Pension or retirement income	8g. <u>\$0.00</u>		
8h. Other monthly income. Specify: _____	8h. + <u>\$0.00</u>		
9. Add all other income. Add lines 8a + 8b + 8c + 8d + 8e + 8f + 8g + 8h.	9. <u>\$1,395.00</u>		
10. Calculate monthly income. Add line 7 + line 9. Add the entries in line 10 for Debtor 1 and Debtor 2 or non-filing spouse.	10. <u>\$1,395.00</u>	+	= <u>\$1,395.00</u>
11. State all other regular contributions to the expenses that you list in Schedule J. Include contributions from an unmarried partner, members of your household, your dependents, your roommates, and other friends or relatives. Do not include any amounts already included in lines 2-10 or amounts that are not available to pay expenses listed in Schedule J. Specify: _____		11. +	<u>\$0.00</u>
12. Add the amount in the last column of line 10 to the amount in line 11. The result is the combined monthly income. Write that amount on the Summary of Schedules and Statistical Summary of Certain Liabilities and Related Data, if it applies.		12.	<u>\$1,395.00</u> Combined monthly income
13. Do you expect an increase or decrease within the year after you file this form? <input checked="" type="checkbox"/> No. <u>None.</u> <input type="checkbox"/> Yes. Explain: _____			

LAW OFFICES OF MIKE HEALY

November 19, 2018 - 3:30 PM

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: 96384-3
Appellate Court Case Title: Hishm Chonah v. Coastal Villages Pollock, LLC, et al.
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