No. 97882-4
SUPREME COURT
OF THE STATE OF WASHINGTON

COURT OF APPEALS, DIVISION I
No. 78025-5-I

RICHARD L. FERGUSON,

Petitioner,

vs.

BAKER LAW FIRM, P.S., *et al.*

Respondents.

RESPONDENTS DANIEL R. LAURENCE'S, ANNE MARIE JACKSON LAURENCE'S, AND STRITMATTER, KESSLER, WHALEN, KOEHLER, MOORE, KAHLER'S ANSWER TO PETITION FOR REVIEW

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TABLE OF CONTENTS

TABLE OF AUTHORITIES

Table of Cases — Page

Statutes

Rules and Regulations

Other Authorities

I. INTRODUCTION

Richard L. Ferguson ("Petitioner"), *pro se*, has filed a "Preliminary Petition for Review," seeking further review of the summary judgment dismissal of all claims brought in his frivolous lawsuit, *Ferguson v. Baker Law Firm et. al.*, No. 17-2-07335-31 (Wash. Super. Ct. 2017). Specific to present Respondents, Daniel Laurence, Anne Marie Jackson Laurence, and Stritmatter Kessler, Whalen, Koehler, Moore, Kahler (hereinafter "Laurence Respondents"[1]), Petitioner seeks review of the trial court's granting of Laurence Respondents' motion for summary judgment, to which Petitioner never filed an opposition, denial of Petitioner's inadequate motion to continue under CR 56(f), and awarding Laurence Respondent mandatory statutory damages, attorney's fees, and costs.

Throughout Petitioner's protracted litigious campaign, he has never specifically identified which claims he attempts to prove against Laurence Respondents. None of the Laurence Respondents employed Petitioner. Laurence Respondents made no demonstrably untrue statements about him.

[1] Respondents Baker Law Firm, P.S., Gary L. Baker and Darcy Baker, Brenda Chavez, and Kelly Matheson and Richard Matheson hereinafter, collectively, "Baker Respondents."

The statements he claims are actionable are sworn testimony in a legal proceeding – a hearing in the state Employment Security Department.

Mr. Laurence testified at the hearing. Mr. Laurence provided only an honest recollection of his observations during a time when he shared office space with Petitioner's former employer.

Laurence Respondents moved for summary judgment dismissal of all such claims, as RCW 4.24.510 provides civil immunity to those giving testimony at an ESD hearing.[2]

Petitioner did not file a response to Laurence Respondents' motion.[3] Petitioner only filed a motion to continue ruling on the motion, under CR 56(f). Petitioner's 56(f) motion was rightly denied, because Petitioner did not identify any discovery that he could pursue, which would create an issue of material fact as to the claims against Laurence Respondents. Accordingly, Laurence Respondents' motion for summary judgment was

[2] Laurence Respondents duly moved to dismiss on the basis that all Petitioner's claims lacked evidence and Petitioner's defamation claim was time-barred under RCW 4.16.100 (Actions limited to two years).

[3] In contrast, Petitioner did file an opposition to the motion for summary judgment brought by Baker Respondents.

granted, and Petitioner's claims against Laurence Respondents were dismissed.

Laurence Respondents also moved for and were awarded mandatory statutory damages, attorney's fees, and costs ($15,377 in total), under RCW 4.24.510. Petitioner did not respond.

These rulings have since been affirmed on three separate occasions: (1) Superior Court Judge Larsen denied Petitioner's motion for reconsideration on February 6, 2018; (2) the Court of Appeals, Division One, affirmed the rulings in an unpublished opinion of August 19, 2019; and (3) denied Petitioner's motion for reconsideration on October 22, 2019.

Despite repeated judicial decisions correcting Petitioner's misreading and misapplication of the law, he continues to press the same meritless arguments here. Review under RAP 13.4(b) is not even facially justified and would serve no purpose. Even if the contrary were true as to some issue presented by Petitioner, the presence of the Laurence Defendants would not be required or justified to determine that issue, would consume additional judicial resources, and could not justly change the result below as to the Laurence Defendants. Therefore, this Court should deny the petition as to them at least.

II. RESPONSE TO ISSUES PRESENTED FOR REVIEW

Petitioner's issues presented do not support review of the dismissal of Petitioner's claims against Laurence Respondents. Petitioner did not respond to Laurence Respondents' motion for summary judgment, and Petitioner presents this Court no issue concerning denial of his inadequate CR 56(f) motion. The only issue presented that could conceivably involve Laurence Respondents is Petitioner's objection to the monetary judgments against him.

To the extent that Petitioner's issues presented are to be considered as to Laurence Respondents, Laurence Respondents answer as follows:

1. The trial court rightly reviewed the administrative record to identify the nature of the statements made at the ESD hearing, not for the truth of the matters asserted.[4] Petitioner's conclusory declaration, parroting his allegations, is not sufficient to raise issues of fact about the transcript's accuracy. Nor does his declaration overcome Washington's statutory immunities, statutes of limitation, or summary judgment requirements to produce *prima facie* proof of all elements of claims.

[4] Petitioner's objection to consideration of the administrative hearing record is based upon a misunderstanding of the rules of evidence. Petitioner has continually failed to understand that his claims were not dismissed based upon a factual finding that Petition did or did not smell of alcohol.

Petitioner has not identified any legal support for his assertion that the Court cannot exercise its discretion as to the order in which it hears argument on motions at a hearing.

2. RCW 50.36.030 does not apply to Laurence Respondents, because they did not employ Petitioner, act as agents of his employer in connection with his termination, or provide any testimony about the basis for his termination. Moreover, Petitioner's purported conflict in the law does not exist, as RCW 50.36.030 is a statute providing *criminal* liability and RCW 4.24.510 is a statute providing *civil* immunity.

3. RCW 4.24.510 mandates the $10,000 statutory sanction and authorizes imposition of reasonable attorneys' fees and expenses. The trial court aptly applied that statute to the present case.

III. RESPONSE TO STATEMENT OF THE CASE

Petitioner Richard L. Ferguson was employed by the Baker Law Firm from approximately May 4, 2014, through March 13, 2015. *See generally, Ferguson v. Dept. of Employment Security*, 200 Wn. App. 1065 (2017) (unpublished) https://www.courts.wa.gov/opinions/pdf/757067. PDF. After Baker Law Firm terminated Petitioner's employment,

he applied for unemployment benefits. *Id.* The Employment Security Department (ESD) denied his benefits, so he appealed. *Id.* An appeal hearing was held before ESD's Office of Administrative Hearings. *Id.* At the hearing, testimony was taken from employees of the Baker Law Firm (Defendants Chavez and Matheson) and their employer Gary Baker. Clerk's Papers ("CP") 386-666. Additionally, Respondent Daniel R. Laurence testified on May 26, 2015. CP 411-27. The administrative judge denied benefits to Ferguson on July 21, 2015. *Ferguson*, 200 Wn. App. 1065.

Mr. Laurence was and is a member of the Stritmatter Kessler Whelan Koehler Moore Kahler law firm (hereinafter, "Stritmatter").[5] CP 293. He was never an employee of Gary L. Baker or the Baker Law Firm. CP 293-294. Mr. Laurence never employed Petitioner, never compensated Petitioner, never paid unemployment compensation premiums on Petitioner's behalf, never directed Petitioner's day-to-day work, and never had the authority to discipline Petitioner or terminate his employment. CP 293-294.

Mr. Laurence had limited interaction with Petitioner when Mr. Laurence shared an office space with Baker Law Firm. Additionally, Mr. Baker assigned Petitioner as paralegal on a single case in which Mr.

[5] The firm has since been renamed Stritmatter Kessler Koehler Moore.

Laurence was co-counsel. CP 294. However, Mr. Laurence did not assign Petitioner to work on the case, and did not control Petitioner's work. CP 294. Mr. Laurence only communicated with Petitioner on the case, at Mr. Baker's suggestion, to get information about facts or case progress. CP 294.

In the spring of 2015, after Petitioner was terminated, Mr. Baker asked Mr. Laurence if he would be willing to testify at the administrative hearing on Petitioner's claim for unemployment benefits. CP 295. Mr. Laurence agreed to testify.

Mr. Laurence was examined under oath by Mr. Baker and cross-examined by Petitioner. CP 411-27. Mr. Laurence testified that, while Petitioner worked at the Baker Law Firm, Mr. Laurence took part in approximately five face-to-face meetings with Petitioner about the case where Mr. Laurence was co-counsel. CP 417; 425. Mr. Laurence testified that, at two or three of those meetings, he smelled what he believed to be the odor of metabolized alcohol coming from Petitioner. CP 416-17; 423-24. Mr. Laurence described the odor as "present" but "not overwhelming". CP 416; 422. Mr. Laurence took care to point out that he was not testifying that Petitioner abused alcohol. CP 420. Mr. Laurence also noted that the odor was different from smelling alcohol on someone's breath, and that he

never saw Petitioner "drinking or with a bottle in his hand" or "drinking in the office." CP 419; 428-29.

Petitioner filed the present lawsuit on July 20, 2017. CP 765-800. He filed an Amended Complaint on September 15, 2017. CP 710-48. The Amended Complaint states nine causes of action: (1) Wrongful termination/discharge; (2) Breach of contract/implied contract; (3) Criminal misconduct violating RCW 50.36.030; (4) Conspiracy to commit criminal misconduct violating RCW 50.36.030; (5) Defamation; (6) Unlawful blacklisting; (7) Negligent supervision/training; (8) Intentional infliction of emotional distress; and (9) Negligent infliction of emotional distress. *Id.*

At no point from the initial filing of suit through the filing of the present "preliminary petition," has Petitioner clearly identified which claims he asserts against Laurence Respondents. So, Laurence Respondents have only ever been able to guess which claims might be asserted against them. In fact, Petitioner has hardly directed any attention to Laurence Respondents in his continued appeal, essentially just dragging them along for the ride as he continues to pursue claims against his former employer.[6]

[6] In the "preliminary petition," Petitioner's statement of the case does not contain the name "Laurence" even a single time, and his argument contains the word "Laurence" all of twice—both during a passage where Petitioner categorizes Mr. Baker's and Mr. Laurence's retaining defense counsel as "bullying" Petitioner.

Laurence Respondents were not Petitioner's employer or Baker Law Firm's agents. Thus, these Respondents are left to infer that Petitioner's claims against them are based on alleged breach of RCW 50.36.030, defamation, and emotional distress. Yet, each such claim is spurious.

Laurence Respondents filed a motion for summary judgment on November 13, 2017, seeking dismissal of any and all claims filed against them. CP 304-24. These Respondents demonstrated that, because all claims against them were premised upon Mr. Laurence's testimony at the ESD hearing, the claims are barred by the privilege provided to witnesses at such hearings by RCW 4.24.510 and the common law. *Id.* Laurence Respondent's also moved for dismissal on the additional bases that Petitioner did not provide any evidence to prove any of his claims, and that Respondent's defamation claim was time-barred. *Id.*

Petitioner did not respond to the motion for summary judgment. Petitioner only filed a motion to continue, under CR 56(f). CP 245-47. In his CR 56(f) motion, Petitioner argued that Laurence Respondents had not answered the complaint; Petitioner had not conducted discovery; and Petitioner needed more time to decide whether to oppose Laurence Respondents' motion for summary judgment. *Id.* However, Petitioner did

not specify what information an answer or discovery might provide; much less why he could not produce such information timely.[7]

The trial court heard argument on all motions on December 22, 2017. CP 209-10. The trial court denied Petitioner's 56(f) motions because Petitioner could not adequately explain why he had not previously attempted to conduct the discovery he now sought; some of the discovery sought was reasonably available to Petitioner; and Petitioner did not provide declaration or evidence suggesting that he could create a dispute of fact sufficient to defeat summary judgment if provided an opportunity for discovery. CP 172-81. Within the same Order, the trial court granted Laurence Respondents' unopposed motion for summary judgment on the bases argued by Laurence Respondents. *Id.* Additionally, the trial court addressed Petitioner's motion to strike to the extent it concerned the matters within Laurence Respondents' motion for summary judgment. *Id.* The trial

[7] Baker Defendants also filed a motion for summary judgment. CP 667-84. In support of that motion, Gary Baker submitted a declaration, which attached the ESD hearing transcript as an exhibit. CP 386-666. In response to Baker Defendants' motion, Petitioner filed an opposition, a motion to continue adjudication of the motion, and a motion to strike all or part of the hearing transcript. CP 261-76 (opposition); 365-69 (motion to continue); 277-83 (motion to strike).

court advised that it would not strike the entire transcript but that it would not consider inadmissible hearsay evidence within the transcript. *Id.*

The trial court also awarded Respondent's reasonable attorney's fees and the required $10,000 in statutory damages, as authorized by RCW 4.24.510. *Id.* The Court later determined the amount of those fees and costs to be $5,377.28. CP 37-41.

Petitioner moved for reconsideration, restating his arguments and arguing that the attorney's fees and sanctions violated due process. CP 96-99. The trial denied reconsideration. CP 56-57.

Petitioner then appealed all of the rulings to the Court of Appeals, Division One. CP 5-29. His appeal mostly addressed his claims against Baker Respondents. *See* App. Brief. To the extent the appeal addressed the claims against Laurence Respondents at all, Petitioner simply parroted his arguments made to the trial court. *Id.* The appellate court denied Petitioner's appeal initially and upon a motion for reconsideration.

Petitioner now brings the present "Preliminary" Petition for Review. Petitioner provides only a partial petition, and his effort suggests no new argument to support additional review by this Court.

IV. ARGUMENT

Petitioner's filing is substantially noncompliant with the Washington Rules of Appellate Procedure (RAP) 13.4. Denial is justified on that basis alone. Furthermore, because Petitioner did not oppose Laurence Respondents' motion for summary judgment, the only of Petitioner's arguments not procedurally foreclosed as to Laurence Respondents are those related to Petitioner's CR 56(f) motion and the prevailing party award under RCW 4.24.510.

In any event, the petition does not provide a sufficient basis, under RAP 13.4(b)(1)-(4), for review of *any* of the rulings of the Court of Appeals.

A. The Court of Appeals' Decision Below Does Not Conflict With a Prior Decision of this Court. RAP 13.4(b)(1).

Petitioner's contention that the decision below conflicts with *Davis v. Cox*, 183 Wn.2d 269, 351 P.3d 862 (2015)[8] is inapposite.

Petitioner tries to manufacture a conflict with *Davis* by arguing, without authority, that Respondents were required to pursue sanctions via a special motion to strike, under RCW 4.24.525. However, that procedure was only ever permissive, not mandatory. *See* RCW 4.24.525(4)(a) ("A party *may* bring a special motion to strike any claim....) (emphasis added). Thus,

[8] *Abrogated* on *other grounds* by *Maytown Sand and Gravel, LLC v. Thurston Co.*, 191 Wash. 2d 392, 423 P.3d 223 (2018).

Respondents were not required to file a special motion to strike (nor did they), and the fact that *Davis* invalidated such a procedure is irrelevant.

Respondents moved under a separate statute, RCW 4.24.510, not affected by *Davis*, which provides relief for a "person prevailing upon the defense provided for in this section," regardless of the stage of litigation. *See Loeffelholz v. Citizens for Leaders with Ethics and Accountability Now*, 119 Wash. App 655, 82 P.3d 1199 (2004), as amended on denial of reconsideration (Mar. 2, 2004) (damages awarded to party prevailing at trial); *Kauzarlich v. Yarbrough*, 105 Wash. App. 632, 20 P.3d 946 (2001) (prevailing at summary judgment).

B. No Conflict exists between the Court of Appeals' Decision and Another Decision of the Court of Appeals. RAP 13.4(b)(2).

Petitioner purports to identify two "conflicts in Washington law": (1) a conflict between RCW 50.36.030 and RCW 4.25.510; and (2) a conflict between RCW 4.24.510 and RCW 4.24.525.[9]

Neither of Petitioner's purported conflicts justifies review of the Court of Appeals' decision as to the Laurence Respondents, because (a) neither represents a conflict in decisions of the Courts of Appeals; (b)

[9] Petitioner also appears to raise Constitutional arguments in this heading, which will be addressed under the heading concerning 13.4(b)(3).

neither represents a conflict of law at all; and (c) RCW 50.36.030 does not apply to Laurence Respondents.

RCW 50.36.030 and RCW 4.24.510

The immunity provided by RCW 4.24.510 does not conflict with the potential criminal liability set out in RCW 50.36.030.

RCW 4.24.510 provides:

> A person[10] who communicates . . . information to any branch or agency of . . . state . . . government, . . . is immune from civil liability for claims based upon the communication to the agency . . . regarding any matter reasonably of concern to that agency . . . .

Notably, RCW 4.24.510 provides immunity from *civil liability*. The legislature specifically identify the threat of "civil action" as a deterrent from providing free information to government that needed to be moderated. RCW 4.24.500.

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[10] Though Petitioner fails to address the requirements of RAP 13.4(b), he quickly lodges one last argument related to RCW 4.24.510, suggesting that the statute's use of the term "person" means that the immunity would not extend to Stritmatter. However, Petitioner only makes claims against Stritmatter by way of Stritmatter's potential "vicarious liability" for the actions of Mr. Laurence. Compl. at ¶ 1.7. Therefore, any liability of Stritmatter would need to be based upon primary liability of Mr. Laurence. *Brown v. Labor Ready Northwest, Inc.*, 113 Wash. App. 643, 646-47, 54 P.3d 166 (2002) ("[I]f a plaintiff is barred from suit against the negligent employee, she cannot sue the employer on a theory of vicarious liability."). Accordingly, Stritmatter is duly shielded by the immunity provided to Mr. Laurence by RCW 4.24.510.

RCW 50.36.030 has nothing to do with *civil liability*. RCW 50.36.030 provides that "Employing units or agents thereof" that provide information to ESD about a cause of an employee's termination, which is contrary to that given to the terminated employee "shall be guilty of a misdemeanor...," *i.e.*, *criminally* liable. RCW 50.36.030 does not provide a right of civil action. The legislature has determined that, on balance, in light of the public policy interests served by civil immunity granted by RCW 4.24.510, prosecution for violation of RCW 50.36.030 remains a viable and sufficient deterrent. Accordingly, those statutes do not conflict with each other.

Moreover, Petitioner's argument that a violation of RCW 50.36.30 would demonstrate bad faith sufficient to vitiate statutory immunity fails because immunity under RCW 4.24.510 does not require good faith. Our legislature repealed that requirement long before Baker Law Firm fired Petitioner. Sub. H.B. 2699, 57th Leg., Reg. Sess. (Wash. 2002); *Bailey v. State of Wash.*, 147 Wn. App. 251, 191 P.3d 1285 (2008).

The Courts of Appeals decisions are consistent. Below, Division One found that that the plain language of the RCW 4.25.510 supports broad immunity, including in the present case. *Ferguson v. Baker Law Firm, P.S. et. al.*, No. 78025-5-I (Wash. Ct. App. 2019) https://www.courts.wa.gov/opinions/pdf/780255.pdf at 12. Such is directly

in line with prior opinions of the Courts of Appeals. *See, e.g.*, *Bailey*, 147 Wash. App. at 262 (Washington law protects "advocacy to government, regardless of motive, so long as it is designed to have some effect on government decision making.").

Moreover, even if the statutes were in conflict, dismissal of the Laurence Respondents would be unaffected, because RCW 50.36.030 does not apply to the Laurence Respondents.[11] RCW 50.36.030 only applies to the claimant's employer or its agents. It is beyond reasonable dispute that none of the Laurence Respondents was an employer of Petitioner or an agent of Petitioner's employer, Baker Law Firm, P.S.

RCW 4.24.510 and RCW 4.24.525

As set forth above in section A, *Davis v. Cox*, does not create or suggest a conflict between RCW 4.24.510 and RCW 4.24.525. Nor does the award to Laurence Defendants of their prevailing party damages conflict with any other decision of the Courts of Appeals. In *Davis*, this Court invalidated the "special motion to strike" procedure in RCW 4.24.525, because it directed the judge to usurp the jury's role to decide issues of *disputed* fact. 183 Wn.2d at 289. However, this Court explicitly noted that "the right of jury trial by jury is not limitless," providing the specific

[11] Further, even the existence of a conflict would not merit review because all of Petitioner's claims were dismissible for insufficiency of evidence, in addition to his defamation claims being time-barred. CP 172-81.

example of the Court's ability to decide issues on summary judgment, "when there is no genuine issue of material fact." *Id.* That is exactly what the trial court did here.

In accord with *Davis*, the Courts of Appeals have recognized not only that RCW 4.24.525 does not preclude summary judgment, but also that RCW 4.24.510 continues to validly mandate prevailing party awards based on the immunity that statute confers. *See, e.g.*, *Swinger v. Vanderpol*, 197 Wash. App. 1022 (2016).

C. No Constitutional Question is Raised. RAP 13.4(b)(3).

Petitioner argues that his constitutional rights were violated by: (1) the Court resolving factual issues at summary judgment; (2) the Court hearing oral argument on summary judgment motions before ruling on Petitioner's motion to strike; and (3) the Court denying his 56(f) motions. Petitioner attempts to raise constitutional issues, but the issues raised only concern the correct application of longstanding Court Rules, which are not in conflict with Petitioner's general quotations of constitutional law.

First, as discussed in section A, this Court has explicitly stated that the Constitutional right to a jury trial does not prohibit pre-trial summary judgment. *Davis*, 183 Wn.2d at 289.

Second, Petitioner presents no relevant authority that a Court must hear oral arguments in the order suggested by Petitioner. As noted by the

Court of Appeals, "A trial judge has wide discretion to manage and conduct Court proceedings." *Ferguson v. Baker Law Firm P.S. et. al.*, No. 78025-5-I at 10 (internal citations omitted).

Moreover, the trial court rightly reserved ruling on Petitioner's motion to strike the administrative record. Petitioner misunderstands the rules of evidence. Petitioner's claims and Respondents' immunity defenses are based upon the Respondents having made certain statements in an adjudicative forum. The Superior Court judge considered those statements independent of "the truth of the matter asserted." They not hearsay. ER 801.

Finally, the Superior Court aptly considered the provisions of CR 56(f) in ruling on Petitioner's motion to continue. Washington law is clear that, to succeed on a CR 56(f) motion, a party must (1) have good reason for delay in obtaining the discovery; (2) specifically articulate the evidence that will be discovered; and (3) show how such evidence would create a factual dispute. *Perez-Cristanos v. State Farm Fire Cas. Co.*, 187 Wn. 2d 669, 686, 389 P.3d 476 (2017). Petitioner failed to identify what discovery he would seek if permitted, and provided no justification for why he had made no effort to obtain discovery in the more than three months since having filed his Amended Complaint.[12]

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[12] "A pro se litigant is held to the same standard as an attorney." *See, e.g., Matter of Estate of Little*, 9 Wn. App. 2d 262, 444 P.3d 23 (2019); *Kelsey v. Kelsey*, 179 Wn. App. 360, 317

Petitioner cites *Coggle v. Snow*, 56 Wn. App. 499, 784 P.2d 554 (1990), in arguing that the courts' adjudication of Petitioner's 56(f) motion violated his constitutional rights or otherwise contradicted Washington law. Regardless of the framing, Petitioner's argument is meritless, as *Coggle* applied the exact same standard applied in *Perez-Cristanos* and by the Court of Appeals in this case. However, in *Coggle*, unlike in this case, "the record reveal[ed] the reason for Coggle's inability to produce declarations," and "Coggle . . . identif[ied] the evidence he sought and explain[ed] that the declarations would rebut the defense." *Id.* at 508.

D. There Is No Issue of Substantial Public Interest. RAP 13.4(d).

To the extent that Petitioner makes any argument that his "issues" are of substantial public interest, Petitioner only parrots his disagreement with the Court's rulings addressed in sections A-C, or makes baseless accusations that any judge who disagrees with Petitioner is biased. Petitioner makes no showing of a substantial public interest arising from the decisions below, as there is no such showing to be made.

P.3d 1096 (2014); *West v. State, Wash. Ass'n of Cty. Officials*, 162 Wn. App. 120, 252 P.3d 406 (2011).

E. CONCLUSION

Petitioner fails to demonstrate how the Court of Appeals' opinion suggests a conflict in precedent or legislation or involves constitutional or public interest issues. These rulings have repeatedly been reviewed and affirmed. There is no reason for another review.

RESPECTFULLY SUBMITTED this 30th day of January, 2020.

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