FILED
SUPREME COURT
STATE OF WASHINGTON
7/10/2020 12:15 PM
BY SUSAN L. CARLSON
CLERK

No. 98375-5

THE SUPREME COURT OF THE STATE OF WASHINGTON

ANNE BLOCK,

Petitioner

VS.

CITY OF DUVALL and CITY OF GOLD BAR

Respondents.

RESPONDENTS CITY OF DUVALL AND CITY OF GOLD BAR'S RESPONSE TO PETITION FOR REVIEW, ET AL.

Shannon M. Ragonesi, WSBA #31951 Amanda G. Butler, WSBA #40473 Keating, Bucklin, & McCormack, Inc., P.S. 801 Second Avenue, Suite 1210 Seattle, WA 98104-1576

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Attorneys for Respondents City of Duvall

and City of Gold Bar

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TABLE OF AUTHORITIES

<u>Cases:</u>
Kokv. Tacoma School Dist. No. 10
179 Wn. App. 10 (2013)
Wolfkill Feed and Fertilizer Corp. v. Martin, 103 Wn. App. 836 (2000)
Rules:
RAP 13.4
RAP 18.8(b)

I. INTRODUCTION

Pursuant to this Court's letter dated June 10, 2020, Respondents City of Duvall and City of Gold Bar ("Respondents") hereby submit this combined opposition to Petitioner's (1) request for an extension of time, (2) disqualification of the Washington State Supreme Court and (3) petition for review.

II. RELEVANT PROCEDURAL HISTORY

Petitioner originally had two matters before the Court of Appeals involving public records requests to the Cities of Duvall and Gold Bar. See Court of Appeals Case Nos. 80340-9-I and 78446-3-I. The matters were never consolidated.¹ The instant case pertains to Case No. 80340-9-I.

On October 11, 2019, the Court stated in part: "Moving forward, the cases will be treated separately..." *Appendix A*. Given the cases were not consolidated, each appeal required its own filing fee. The court ordered Petitioner to pay the filing fee by October 25, 2019. *Appendix A*. She did not.

On December 18, 2019, the Court issued an Order Denying Pending Motions to Modify and Related Motions stating in part: "it is further

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¹ Case No. 78446-3-I has been dismissed.

ORDERED that if the filing fee in No. 80340-9 is not paid within ten days of the date of this order, the appeal will be dismissed." *Appendix B*.

Petitioner failed to comply with this Order. Thus, on January 9, 2020, the Court issued a letter stating: "The filing fee has not been paid as required be recent order. Review is dismissed." *Appendix C*.

On January 21, 2020, Petitioner filed a Motion to Modify Commissioner/Clerk's January 9, 2020 Order. On March 5, 2020, the Court denied the Motion to Modify. *Appendix D*.

In sum, Petitioner failed to pay the filing fee by the deadline set forth in the Court's December 18, 2019 order (and in the October 11, 2019 order).

Based upon the docket and materials submitted by Petitioner, it appears Ms. Block paid the filing fee on February 11, 2020. This only confirms Petitioner failed to comply with the Court's orders to pay the fee by the October and December 2019 deadlines.

Petitioner now petitions for review of the March 5, 2020 order.

III. THE REQUEST FOR EXTENSION OF TIME SHOULD BE DENIED

On April 3, 2020, Petitioner filed "Appellants Notice of Appeal on Case 80340-9-I Notifying Supreme Court that Appeal was Paid in full and WA Court of Appeals Div. One Refuses to Dkt Payment was Made."

On April 8, 2020, the Court sent a letter to Petitioner stating in part as follows:

The Rules of Appellate Procedure (RAP) do not provide for such a notice procedure to be used to seek review of a Court of Appeals opinion. The proper method by which to request review is by the service and filing of a petition for review, see RAP 13.4. The contents and style of a petition for review should conform to the requirements of RAP 13.4(c). It is noted that RAP 13.4(f) provides that the petition for review "should not exceed 20 pages double spaced, excluding appendices." I have enclosed for the Petitioner a copy of RAP 13.4 and Forms 9, 5, and 6, and part F of Form 3 from the appendix to the Rules of Appellate Procedure. These provide the Petitioner with the basic required contents and the suggested form for a petition review.

Because the notice was timely filed in this Court, the Petitioner is granted permission to serve and file with this Court a petition for review, provided it is served and filed by May 7, 2020. At such time, if any, as Petitioner serves and files a petition for review, a date will be established for the filing of any answer to the petition. *Failure to file a proper petition for review with this Court by May 7, 2020, will most likely result in dismissal of this matter.*

(emphasis added). Appendix E.

On May 8, 2020, one day *after* the Petition was due, Petitioner submitted a request for an extension of time to file her petition for review. She stated she is a "person directly affected by the corona-virus pandemic."

RAP 18.8(b) states:

(b) Restriction on Extension of Time. The appellate court will only in extraordinary circumstances and to prevent a gross miscarriage of justice extend the time within which a party must file aa petition for review. The appellate court will ordinarily hold that the desirability of finality of decisions outweighs the privilege of a litigant to obtain an extension of time under this section

As a threshold matter, Petitioner filed her request for extension of time *after* the deadline for the petition had passed. Petitioner does not appear concerned with the orders and rules of this Court. The Court provided her with clear and concise instructions when she initially filed her improper Notice. Petitioner did not comply with the order.

While Respondents concede the COVID-19 pandemic itself is an extraordinary circumstance, Petitioner has failed to demonstrate how/why it would prevent her from timely filing her petition, particularly when she was able to prepare and file the initial (improper) notice and motion for extension of time during this same pandemic. *Appendix F (Docket)*.

The request for additional time and the petition itself were both untimely. The petition should not be considered.

IV. THE MOTION TO DISQUALIFY SHOULD BE DENIED

Petitioner argues the entire Supreme Court should be disqualified for various indecipherable reasons. Petitioner's briefing is rife with assertions and statements lacking any basis in fact, as evidenced by the lack of citation. As an example, the Court can take judicial notice that the undersigned does not represent the Washington State Bar Association and/or any of the Supreme Court Justices in any cases filed by Petitioner (or any others).

A party seeking recusal of a judge (or here an entire panel) must produce sufficient evidence demonstrating actual or potential bias, such as personal or pecuniary interest on the part of the judge; mere speculation is not enough. *Kokv. Tacoma School Dist. No. 10*, 179 Wn. App. 10, 317 P.3d 481 (2013). Due process, the appearance of fairness, and the Code of Judicial Conduct require disqualification of a judge who is biased against a party or whose impartiality may be reasonably questioned. *Wolfkill Feed and Fertilizer Corp. v. Martin*, 103 Wn. App. 836, 14 P.3d 877 (2000).

Petitioner has failed to identify any tangible evidence of actual or potential bias. Her misrepresentations, unsupported assertions and rank speculation on the issue are insufficient to trigger recusal. The request should be denied.

V. THE PETITION FOR REVIEW SHOULD BE DENIED

Petitioner argues the court clerk does not have discretion "not to process and docket Appellant's appeal after payment is made." The procedural history in this case clearly demonstrates that is not what occurred here.

The Court ordered Petitioner to pay the filing fee in October 2019 and again in December—no later than 10 days after the December 18, 2019 order. She did not. She very clearly has violated multiple court orders.

She now provides that she paid the filing fee in February 2020. Again, that does not change the fact she failed to comply with the December 2019 order (and the October 2019 order).

Rules govern the acceptance of review in this Court. RAP 13.4(b) states:

(b) Considerations Governing Acceptance of Review. A petition for review will be accepted by the Supreme Court only: (1) If the decision of the Court of Appeals is in conflict with a decision of the Supreme Court; or (2) If the decision of the Court of Appeals is in conflict with a published decision of the Court of Appeals; or (3) If a significant question of law under the Constitution of the State of Washington or of the United States is involved; or (4) If the petition involves an issue of substantial public interest that should be determined by the Supreme Court.

Petitioner has failed to provide any analysis as to how/why this criteria is met. Instead, Petitioner summarily states on page 9 that her case "meets criteria for review set forth in 13.4." It does not.

Again, it is undisputed Petitioner failed to comply with the Court's December 18, 2019 order (and the October 2019 order) and dismissal resulted. First, the decision rendered by the Court of Appeals is not in conflict with a decision of the Supreme Court. Second, the decision is not in conflict with a decision of the Court of Appeals. Petitioner has failed to identify a single case holding that a court may not dismiss a case when a Petitioner violates multiple court orders pertaining to a filing fee. Third, Petitioner's failure to comply with a court order does not involve a

significant question of law under the federal or state Constitution. And finally, this is not an issue of substantial public interest.

While Petitioner feels strongly about her personal payment issue in the Court of Appeals, that alone does not warrant review. The issue Petitioner raises is unique to her and does not involve a broader issue of public interest let alone a significant one.

The criteria for review are not met. The petition should be denied.

VI. CONCLUSION

Petitioner's requests for extension of time, disqualification and petition for review should be denied.

DATED this 10th day of July, 2020.

Respectfully submitted,

s/Shannon M. Ragonesi

Shannon M. Ragonesi, WSBA # 31951 Amanda G. Butler, WSBA #40473 Attorney for Respondents City of Duvall and City of Gold Bar

DECLARATION OF SERVICE

I, Sarah Damianick, being of lawful age, declare under penalty of perjury that on July 10, 2020, I sent out for filing with the Clerk of the U.S. Supreme Court and for service on counsel of record, via EMAIL to the following:

Pro Se Plaintiff
Anne K. Block
115 3/4 W. Main St, Suite 204
Monroe, WA 98272
206.326.9933
Email: lifeisgood357@comcast.net
☑ E-mail □ United States Mail □ Legal Messenger

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

DATED this 10th day of July, 2020, at Seattle, Washington.

s/Sarah Damianick

Sarah Damianick, Legal Assistant Keating, Bucklin & McCormack, Inc., P.S. 801 Second Avenue, Suite 1210 Seattle, WA 98104-1576 sdamianick@kbmlawyers.com

APPENDIX A

RICHARD D. JOHNSON, Court Administrator/Clerk

The Court of Appeals of the State of Washington

DIVISION I
One Union Square
600 University Street
Seattle, WA
98101-4170
(206) 464-7750
TDD: (206) 587-5505

October 11, 2019

Shannon Mary Ragonesi Keating Bucklin & McCormack 801 2nd Ave Ste 1210 Seattle, WA 98104-1518 sragonesi@kbmlawyers.com

Anne Block 115 3/4 West Main St. Suite 204 Monroe, WA 98272 lifeisgood357@comcast.net

Amanda Gabrielle Butler Keating Bucklin & McCormack Inc PS 801 2nd Ave Ste 1210 Seattle, WA 98104-1518 abutler@kbmlawyers.com

CASE #: 78446-3-I
Anne Block, Petitioner v. City of Duvall & City of Gold Bar, Respondents

CASE #: 80340-9-I
Anne Block, Petitioner v. City of Duvall & City of Gold Bar, Respondents

Counsel:

The following notation ruling by Commissioner Mary Neel of the Court was entered on October 11, 2019:

Anne Block currently has two matters before this court involving her public records requests to the Cities of Duvall and Gold Bar, No. 78446-3-I and No. 80340-9-I. Moving forward, the cases will be treated separately, and the parties should take care to put the correct case number on any filing.

In No. 78446-3-I, Block appeals a trial court order dismissing her actions against the Cities. There are pending motions to modify, and the appeal has been dismissed. Pending motions will be submitted to a panel of judges for consideration.

The remainder of this ruling addresses the proceedings in No. 80340-9-I.

No. 80340-9-I involves a contempt proceeding. On July 30, 2019, Block filed a notice of appeal challenging a July 17, 2019 trial court order denying her motion for the appointment of counsel. On August 12, 2019, Block filed a notice of intent to seek discretionary review of "Judge Michael Scott's Order Denying Right to Jury Trial and Assignment of Counsel When

Faced With Contempt for Engaging in Legally Protected First Amendment Activity." Both notices seek review of the July 17, 2019 trial court order. Block did not pay the filing fee.

On August 20, 2019, the court sent two letters: the first letter noted Block's failure to pay the filing fee. The second letter informed Block that her notice of appeal would be treated as a notice of discretionary review and that under RAP 6.2(b), the motion for discretionary review was due 15 days after filing the notice.

On August 23, 2019, Block filed an objection/motion to modify/request for extension of time. Although the request for relief is unclear, Block stated that she had previously informed the court of her unavailability, and she argued that the time allowed to file a motion for discretionary review is unreasonably short and unfair. Block also appeared to take issue with the court letter treating her notice of appeal as a notice of discretionary review, asserting there is nothing "discretionary" about a potential contempt order. (Block filed the same objection/motion under No. 78446-3-I).

On September 4, 2019, Block filed a motion for a writ of mandamus and motion to modify in which she asked the court to order the Clerk to process her August 23, 2019 objection/motion. (Block filed the same motion under No. 78446-3-I).

Also on September 4, 2019, I issued a ruling noting the procedural complexity of Block's pending cases and directed both parties to address the relationship between the cases and potential consolidation by September 23, 2019.

In the meantime, on September 16, 2019, Block filed an amended notice of appeal purporting to seek review of an August 16, 2019 trial court order ("Order Denying Plaintiff's Motion to Strike Defendant's Motion to Strike for failing to serve Plaintiff pursuant to CR 5 with Motion for Sanctions and Attorney Fees" and "Order holding Plaintiff in Contempt for exercising her First Amendment rights and refusal to answer Plaintiff's Motion to Disqualify Judge Michael Scott for cause." The actual August 16, 2019 order is captioned "Order Denying Plaintiff's Amended Motion for Relief from Judgment or Order and Awarding Sanctions Against Plaintiff." In this order, the court (1) denied Block's motion for relief from judgment, (2) found Block's motion violated CR 11, was filed to harass defendants, and lesser sanctions had been unsuccessful and were not appropriate, (3) found Block had engaged in harassing and abusive conduct, and (4) ordered Block to pay \$5,000 to both the City of Duvall and the City of Gold Bar within 30 days.

On September 23, 2019, Block filed the requested response to my September 4, 2019 ruling. In the response she asserted that consolidation of her two cases is appropriate. She also appeared to argue why discretionary review should be granted. The Cities did not file a response.

Having reviewed the procedural complexities, I conclude:

Block is seeking review of a July 17, 2019 order and an August 16, 2019 order. Although the July 17 order initially was not appealable, the August 16 order imposing sanctions is

appealable, and review of the latter order brings up the earlier order. Block must pay the filing fee. Block's August 23 and September 4 motions are at this point moot as to this case and are placed in the file without action. Consolidation is inappropriate and would cause unnecessary confusion and delay. The clerk will set a perfection schedule.

Now, therefore, it is

ORDERED that review in No. 80340-9-I will go forward as an appeal; and it is

ORDERED that review in No. 80340-9-I and No. 78446-3-I will not be consolidated; and it is

ORDERED that by October 25, 2019, Block must pay the filing fee; and it is

ORDERED that the clerk will set a perfection schedule.

Sincerely,

Richard D. Johnson

Court Administrator/Clerk

jh

APPENDIX B

FILED 12/18/2019 Court of Appeals Division I State of Washington

THE COURT OF APPEALS OF THE STATE OF WASHINGTON DIVISION ONE

)	No. 78446-3-I
)	No. 80340-9-I
ý	
))))	ORDER DENYING PENDING MOTIONS TO MODIFY AND RELATED MOTIONS

On October 11, 2019, a commissioner of this court referred all of appellant Anne Block's pending motions to modify in No. 78446-3 to a panel of judges. The Commissioner also ruled that Block's August 23, 2019 and September 4, 2019 motions to modify/motion for a writ of mandamus were rendered moot as to appeal No. 80340-9 by her ruling declaring the orders in that case appealable as a matter of right.

We have reviewed the pending motions and any responses in both appeal No. 78446-3 and No. 80340-9, including Block's motions to modify/motions for writ filed on March 5, 2019, August 23, 2019, September 4, 2019, and October 21, 2019, and have determined that the motions should be denied and/or are moot. We have also determined that Block has never paid the filing fee in No. 80340-9. If the fee is not paid within ten days, the appeal will be dismissed. Now, therefore, it is hereby

ORDERED that all pending motions to modify/motions for writ are denied; and it is further

ORDERED that if the filing fee in No. 80340-9 is not paid within ten days of the date of this order, the appeal will be dismissed.

APPENDIX C

RICHARD D. JOHNSON, Court Administrator/Clerk

The Court of Appeals of the State of Washington

DIVISION I One Union Square 600 University Street Seattle, WA 98101-4170 (206) 464-7750 TDD: (206) 587-5505

January 9, 2020

Shannon Mary Ragonesi Keating Bucklin & McCormack 801 2nd Ave Ste 1210 Seattle, WA 98104-1518 sragonesi@kbmlawyers.com Anne Block 115 3/4 West Main St. Suite 204 Monroe, WA 98272 lifeisgood357@comcast.net

Amanda Gabrielle Butler Keating Bucklin & McCormack Inc PS 801 2nd Ave Ste 1210 Seattle, WA 98104-1518 abutler@kbmlawyers.com

CASE #: 80340-9-I

Anne Block, Petitioner v. City of Duvall & City of Gold Bar, Respondents

Counsel:

The following notation ruling by Commissioner Mary Neel of the Court was entered on January 9, 2020:

The filing fee has not been paid, as required by recent order. Review is

Sincerely,

dismissed.

Richard D. Johnson

Court Administrator/Clerk

jh



FILED 3/5/2020 Court of Appeals Division I State of Washington

THE COURT OF APPEALS OF THE STATE OF WASHINGTON DIVISION ONE

ANNE BLOCK,) No. 80340-9-I
Petitioner,)
V.	ORDER DENYING MOTION TO MODIFY
CITY OF GOLD BAR, and CITY OF DUVALL,)))
Respondents.))

Petitioner Anne Block moves to modify the commissioner's January 9. 2020 ruling dismissing this appeal for noncompliance with an order directing her to pay the filing fee. Respondents have not filed a response. We have considered the motion and Block's February 11, 2020 "Declaration of Petitioner and Notice of 2nd Payment for Appeal" under RAP 17.7 and have determined that the motion should be denied.

Now, therefore, it is hereby

ORDERED that the motion to modify is denied.

Chur C.

APPENDIX E

THE SUPREME COURT

SUSAN L. CARLSON SUPREME COURT CLERK

ERIN L. LENNON DEPUTY CLERK/ CHIEF STAFF ATTORNEY STATE OF WASHINGTON



TEMPLE OF JUSTICE P.O. BOX 40929 OLYMPIA, WA 98504-0929

(360) 357-2077 e-mail: supreme@courts.wa.gov www.courts.wa.gov

April 8, 2020

LETTER SENT BY E-MAIL ONLY

Anne Block 115 3/4 West Main Street Suite 204 Monroe, WA 98272

Shannon Mary Ragonesi Amanda Gabrielle Butler Keating Bucklin & McCormack 801 2nd Avenue, Suite 1210 Seattle, WA 98104-1518 Hon. Richard D. Johnson, Clerk Court of Appeals, Division I 600 University Street One Union Square Seattle, WA 98101-1176

Re: Supreme Court No. 98375-5 - Anne Block v. City of Duvall; City of Gold Bar Court of Appeals No. 80340-9-I

Clerk, Counsel and Ms. Block:

The Petitioner's "APPELLANT'S NOTICE OF APPEAL ON CASE 80340-9-I NOTIFYING SUPREME COURT THAT APPEAL WAS PAID IN FULL AND WA COURT OF APPEALS DIV. ONE REFUSES TO DKT PAYMENT WAS MADE" was filed in the Court of Appeals on April 3, 2020, and forwarded to the Supreme Court. The case has been assigned the above referenced Supreme Court cause number.

The Rules of Appellate Procedure (RAP) do not provide for such a notice procedure to be used to seek review of a Court of Appeals opinion. The proper method by which to request review is by the service and filing of a petition for review, see RAP 13.4. The contents and style of a petition for review should conform to the requirements of RAP 13.4(c). It is noted that RAP 13.4(f) provides that the petition for review "should not exceed 20 pages double spaced, excluding appendices." I have enclosed for the Petitioner a copy of RAP 13.4 and Forms 9, 5, and 6, and part F of Form 3 from the appendix to the Rules of Appellate Procedure. These provide the Petitioner with the basic required contents and the suggested form for a petition review.

Because the notice was timely filed in this Court, the Petitioner is granted permission to serve and file with this Court a petition for review, provided it is served and filed by May 7,

Page 2 No. 98375-5 April 8, 2020

2020. At such time, if any, as Petitioner serves and files a petition for review, a date will be established for the filing of any answer to the petition. Failure to file a proper petition for review with this Court by May 7, 2020, will most likely result in dismissal of this matter.

Also, the required \$200 filing fee is due. If the filing fee is not received by May 7, 2020, it is likely that this matter will be dismissed.

The parties are referred to the provisions of General Rule 31(e) regarding the requirement to omit certain personal identifiers from all documents filed in this court. This rule provides that parties "shall not include, and if present shall redact" social security numbers, financial account numbers and driver's license numbers. As indicated in the rule, the responsibility for redacting the personal identifiers rests solely with counsel and the parties. The Clerk's Office does not review documents for compliance with the rule. Because briefs and other documents in cases that are not sealed may be made available to the public on the court's internet website, or viewed in our office, it is imperative that such personal identifiers not be included in filed documents.

The parties are advised that future correspondence from this Court regarding this matter will most likely only be sent by an e-mail attachment, not by regular mail. For attorneys, this office uses the e-mail address that appears on the Washington State Bar Association lawyer directory. Counsel are responsible for maintaining a current business-related e-mail address in that directory. For the Petitioner, this Court has an e-mail address of lifeisgood357@comcast.net. If this e-mail address is incorrect or changed, the Petitioner should immediately advise this Court in writing.

Sincerely,

Erin L. Lennon

Supreme Court Deputy Clerk

ELL:bw

Enclosures for Petitioner

APPENDIX F





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Appellate Court Case Summary

Case Number: 803409 Filing Date: 08-07-2019

Coa, Division I

Event Date	Event Description	Action
07-30-19	Amended NDR	Filed
08-07-19	Notice of Discretionary Review	Filed
08-12-19	Case Received and Pending	Status Changed
08-12-19	Other	Filed
08-20-19	Motion to Dismiss (fail to Pay Filg fee)	Filed
08-20-19	Perfection Letter	Sent by Court
08-22-19	Motion for Discretionary Review-C/a	Not filed
08-23-19	Letter	Received by Court
09-04-19	Other Ruling	Filed
09-16-19	Amended Notice of Appeal	Filed
09-16-19	Other filing	Filed
09-23-19	Other filing	Not filed
09-23-19	Other filing	Not filed
09-25-19	Notice of Appeal	Filed
10-11-19	Other Ruling	Filed
10-11-19	Perfection Letter	Sent by Court
11-04-19	Response	Filed
11-08-19	Motion for Consolidation	Filed
12-18-19	Other Order	Filed
12-31-19	Designation of Clerks Papers	Information - not filed
12-31-19	Statement of Arrangements	Information - not filed
01-09-20	Ruling terminating Review	Filed
01-09-20	Decision Filed	Status Changed
01-21-20	Motion to Modify Ruling	Filed
01-23-20	Notice of Unavailabity	Filed
01-27-20	Motion - Other	Filed
01-31-20	Response to motion	Information - not filed
02-11-20	Affidavit of Service	Filed
02-11-20	Other filing	Filed
02-11-20	Filing fee	Received by Court
03-05-20	Order on Motions	Filed
03-30-20	Other filing	Filed
04-03-20	Petition for Review	Filed
04-08-20	Letter	Received by Court
10-26-20	Check case Information	Due

About Dockets

About Dockets

You are viewing the case docket or case summary. Each Court level uses different terminology for this information, but for all court levels, it is a list of activities or documents related to the case. District and municipal court dockets tend to include many case details, while superior court dockets limit themselves to official documents and orders related to the case.

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Directions

Coa, Division I 600 University St One Union Square Seattle, WA 98101-1176 Map & Directions 206-464-7750[Clerk's Office] 206-389-2613[Clerk's Office Fax]

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No. The Washington State Patrol (WSP) maintains state criminal history record information. Click here to order criminal history information.

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- ▶ Assume any liability resulting from the release or use of the information? NO

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KEATING BUCKLIN & MCCORMACK

July 10, 2020 - 12:15 PM

Transmittal Information

Filed with Court: Supreme Court

Appellate Court Case Number: 98375-5

Appellate Court Case Title: Anne Block v. City of Duvall; City of Gold Bar

The following documents have been uploaded:

• 983755_Answer_Reply_20200710121245SC087197_3923.pdf

This File Contains:

Answer/Reply - Answer to Petition for Review

The Original File Name was Respondents Answer.pdf

A copy of the uploaded files will be sent to:

- abutler@kbmlawyers.com
- lifeisgood357@comcast.net
- sdamianick@kbmlawyers.com

Comments:

Respondents hereby submit this combined opposition to Petitioner (2) (1) request for an extension of time, (2) disqualification of the Washington State Supreme Court and (3) petition for review.

Sender Name: Shannon Ragonesi - Email: sragonesi@kbmlawyers.com

Address:

801 2ND AVE STE 1210 SEATTLE, WA, 98104-1518

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Note: The Filing Id is 20200710121245SC087197