No. 99203-7

SUPREME COURT
OF THE STATE OF WASHINGTON

Rebekah L. Hart, Appellant

v.

Emily Prather, et al, Respondents

ANSWER OF RESPONDENTS EMILY PRATHER AND PARKER KNAUER TO APPELLANT'S PETITION FOR REVIEW

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I. IDENTITY OF RESPONDENTS

Respondents submitting this Answer are Emily Prather and Parker Knauer. (Prather and Knauer)

II. COURT OF APPEALS DECISION

The Court of Appeals filed an unpublished decision on August 24, 2020 that affirmed a judgment entered severally against Prather and Knauer and other defendants. On October 5, 2020, the Court of Appeals issued an order denying plaintiff Rebekah Hart's motion for reconsideration of that decision.

III. COUNTERSTATEMENT OF ISSUES PRESENTED FOR REVIEW

Respondents Prather and Knauer acknowledge the issues advanced in the Petition for Review but assert that the issues raised in the Petition are more appropriately formulated as follows:

(1) Did the Court of Appeals appropriately affirm the trial court's entry of judgment severally against defendants, including Prather and Knauer, when there were multiple unrelated accidents and the jury determined that Plaintiff Hart's damages were divisible between the accidents.

(2) Did the Court of Appeals appropriately affirm the trial court's entry of judgment when it was based on a verdict form that allowed the jury to divide damages in accordance with the four unrelated

accidents, regardless of who was at fault.

IV. COUNTERSTATEMENT OF THE CASE

As noted in the Court of Appeals decision at page 8, this case involved a situation "where there were multiple unrelated accidents and the jury determined that Ms. Hart's damages were divisible as between the accidents." In particular, there were four discrete automobile collisions that occurred over a number of years, all of which involved Plaintiff Rebecca Hart. Ms. Hart was involved in separate collisions, which occurred on the following dates: March 1, 2009; December 22, 2009; April 7, 2013; and March 22, 2014.

On March 1, 2009, Emily Prather was driving the family car of her then high school boyfriend, Parker Knauer, a 2001 Dodge Durango, on the Olympic Drive overpass on Highway 16 in Gig Harbor.[1] Mr. Knauer was the front seat passenger. Ms. Prather maneuvered into the left-hand turn lane[2] and, upon receiving a left turn arrow, she made her left turn.[3] While making her turn, the vehicle collided with Ms. Hart's Nissan.[4]

On December 22, 2009, nine months later, Ms. Hart was involved in a second collision.[5] While riding as a passenger in Brayden Stanton's step-father's Nissan Titan, Ms. Hart participated in some off-roading and four-wheeling.[6] While engaging in some negligent activity, which Plaintiff

[1] RP 635-636.
[2] RP 637.
[3] RP 676.
[4] RP 637.
[5] RP 648.
[6] RP 648.

Hart alleged involved Eric Nelson ("Nelson"), Mr. Stanton lost control of the vehicle, and he, along with Ms. Hart, traveled off of the road and into the trees and brush.[7]

On April 7, 2013, Ms. Hart again was traveling near the Olympic Drive overpass on Highway 16 in Gig Harbor when David Barker ("Barker") failed to yield the right-of-way while turning and collided with Ms. Hart's vehicle.[8]

Finally, on March 22, 2014, Ms. Hart was involved in a fourth and final collision. Ms. Hart was riding as a passenger in her friend Brittany Powell's vehicle.[9] Ms. Powell claimed that her tire blew while she was trying to merge onto I-5, which caused her vehicle to spin and collide with another vehicle. In the process, Ms. Powell had crossed four lanes of traffic and was hit at highway speed by an oncoming vehicle on the front passenger side of the vehicle, which is where Ms. Hart was located.[10]

The jury heard evidence that allowed for segregation of damages from those accidents. For example, Harold Lee Rappaport, an experienced neurologist and psychiatrist[11] was initially retained by Ms. Prather and Mr. Knauer to perform a CR 35 examination and corresponding records review of Ms. Hart,[12] and Dr. Rappaport was further retained by other defendants in this matter relating to the remaining collisions.[13] Dr. Rappaport

[7] RP 651.
[8] RP 655.
[9] RP 661.
[10] RP 696.
[11] RP 2775.
[12] RP 2782.
[13] RP 2785.

diagnosed Ms. Hart as suffering from a cervical dorsal sprain and strain and secondary headaches as a result of the March 1, 2009 accident.[14] He further opined that Ms. Hart had not suffered any disability or impairment related to the March 1, 2009 accident.[15]

Dr. Rappaport diagnosed Ms. Hart with the following injuries as a result of the December 22, 2009 accident: cervicodorsal and lumbosacral sprain/strain, with secondary headaches.[16] Dr. Rappaport opined that the "cervicodorsal strain and secondary headaches were present from the first accident but had largely resolved by the time of the second accident."[17]

Question 11 on the special verdict form asked the jury to determine whether the injuries were divisible between the accidents, stating: "Given the timeline of the collisions set forth above, were some of plaintiff's economic and non-economic injuries indivisible injuries," and the jury answered "no."[18]

In crafting the special verdict form, the trial court took into account input from the jury and counsel to provide a verdict form that allowed the jury to divide those divisible injuries between the four accidents in which Ms. Hart had been involved.

In that respect, on February 20, 2018, amid jury deliberations, the trial court received juror question 4, requesting clarification of Question 10 on the Special Verdict Form and Jury Instruction 12, as "they mention 4

[14] RP 2803.
[15] RP 2804.
[16] RP 2833.
[17] RP 2833.
[18] CP 2562.

accidents but Brittney Powell is found not negligent."[19] Due to the confusion in how to deal with injuries considered to have been caused by the March 22, 2014 accident, the trial court issued a Revised Special Verdict Form to include the March 22, 2014 accident. [20] It was the trial court's intent to "put the collision of March 22nd, 2014, back in the allocation of divisible responsibility."[21] This inclusion was to allow the jurors to adequately divide the damages, including damages deemed to have been caused by the March 22, 2014 incident regardless of whether anyone was at fault.[22] The Attorney for Ms. Hart, Mr. Lindenmuth, recommended adding language to the trial court's revised proposed language for question 10, and the trial court included the proposed language.[23]

Although Ms. Hart's counsel originally took exception to the revised verdict form[24], following the finalization of the revised special verdict form, Ms. Hart's counsel expressed satisfaction with the form, stating "I note from the Plaintiff's position the Court has now helped in providing needed clarity."[25]

V. ARGUMENT WHY REVIEW SHOULD BE DENIED

Review should be denied because the Court of Appeals' decision to

[19] CP 2512-2514
[20] RP February 20, 2018, Pg. 12.
[21] *Id.*
[22] *Id.* at 13.
[23] *Id.* at 15.
[24] *Id.* at 18.
[25] *Id.* at 23.

affirm several liability in a case involving multiple unrelated accidents and divisible injuries is consistent with Washington precedent, and with RCW 4.22.070 and the policy behind that statute.

A. Considerations Governing Acceptance Of Review Compel Rejection Of The Petition.

RAP 13.4 sets forth the considerations governing acceptance of review:

> **(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 published 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.

RAP 13.4(b).

Petitioner argues that review is appropriate under subsections (1) and (4). But that argument should be rejected because the Court of Appeals' decision to affirm a judgment finding several liability and allocating damages between four car accidents that were unrelated and separated by

time does not conflict with any published decision by the Washington Supreme Court or Court of Appeals and does not conflict with RCW 4.22.070. Further, given that the Court of Appeals decision is consistent with Washington law, no substantial public interest would be furthered by the Supreme Court accepting review. The Petition should be denied.

B. Review Should Be Denied Because The Decision Of The Court Of Appeals To Affirm A Judgment Providing Several Liability Does Not Conflict With Any Decision From The Supreme Or Court Of Appeals And Does Not Conflict with RCW 4.22.070.

Contrary to what is asserted in the Petition, the Court of Appeals' affirmance of the judgment providing for several liability in this case is consistent with text of RCW 4.22.070 and with the public policy behind that statute.

As noted in the Court of Appeals decision, "Through the 1986 tort reform act, the legislature abrogated the common law rule of joint and several liability, leaving several liability as the default. Afoa, 191 Wn.2d at 119."[26] The Court of Appeals decision also cited the statutory exception that applies when a plaintiff is not at fault:

> 1) … The liability of each defendant shall be several only and not be joint except:

…

[26] *Hart v. Prather*, 2020 Wash.App. LEXIS 2365 at 7, (citing *Afoa v. Port of Seattle*, 191 Wn.2d 110,119, 421 P.3d 903 (2018)

> (b) If the trier of fact determines that the claimant or party suffering bodily injury or incurring property damages was not at fault, the defendants against whom judgment is entered shall be jointly and severally liable for the sum of their proportionate shares of the claimants [claimant's] total damages.[27]

Plaintiff Hart makes the untenable argument that the language cited above provides for joint and several liability even if, as here, the plaintiff's damages arose from multiple accidents and those damages were divisible such that if joint and several liability were imposed, then defendants would be held jointly and severally liable for injuries that those defendants did not cause and to which they did not even contribute.

The Court of Appeals cited to the statute and case precedent to correctly reject Plaintiff Hart's argument, and instead correctly held that joint and several liability applies only to injuries caused by an accident where more than one defendant is liable:

> RCW 4.22.070(1)(b), as interpreted by Kottler, provides that joint and several liability applies when the plaintiff was not at fault and the defendants are jointly liable for "the sum of their proportionate liability."136 Wn.2d at 446. This must mean that joint liability applies only to injuries caused by an accident where more than one defendant is liable. Thus, for example, defendants Parker and Knauer—who were involved in only the first accident—cannot be held jointly liable under the statute for injuries caused by the second and third accidents. This is the only reasonable interpretation of the statute as to this issue, so it is not ambiguous.

[27] RCW 4.22.070

> Here, where there were multiple unrelated accidents and the jury determined Hart's damages were divisible as between the accidents, the legislature's policy choice to make several liability the default rule applies. See Cox v. Spangler, 141 Wn.2d 431, 446, 5 P.3d 1265 (2000) (noting that joint liability applies when there is either concert of action or independent torts uniting to cause a single injury). The trial court did not err.[28]

The Court of Appeals pointed out in footnote 5 that it would be an absurd construction to hold Parker and Knauer, who were involved in only the first accident, to be liable for injuries caused by later accidents - with the Court of Appeals stating, "To this point, we note that we avoid readings of statutes that produce absurd results. Benson, 4 Wn.App. at 26.[29]"

The absurdity of Plaintiff's interpretation that would make defendants like Prather and Knauer jointly and severally liable for injuries caused only by later accidents is illustrated by a hypothetical similar to that raised by Judge Chun during oral argument before the Court of Appeals. Under Ms. Hart's interpretation of RCW 4.22.070, there would be joint and several liability in a case where (1) there were two accidents at issue in one lawsuit, (2) the plaintiff was not at fault for either accident; (3) the first accident resulted in only a broken finger and in the second accident the

[28] *Hart v. Prather*, 2020 Wash.App. LEXIS 2365 at 7, (citing *Kottler v. State*, 136 Wn.2d 437, 963 P.2d 834 (1998).

[29] *Hart v. Prather*, 2020 Wash.App. LEXIS 2365 at 8 fn. 5, (citing *Benson v. State*, 4 Wn.App.2d 21, 26, 419 P.3d 484 (2018).

plaintiff was paralyzed. Such an interpretation would result in a defendant who caused only a broken finger in the first accident being jointly liable for the paralysis caused by the second accident, and such a result would be grossly unfair and absurd.

Further, as noted by the Court of Appeals in footnote 6, the interpretation of RCW 4.22.070 asserted by Plaintiff Hart would run counter to the purpose of RCW 4.22.070, which was to limit the application of joint and several liability:

> Even if RCW 4.22.070 were ambiguous, legislative history would compel us to reach the same result. Through the 1986 tort reform act (Act), the legislature sought to limit the applicability of joint liability. See Duke v. Boyd, 133 Wn.2d 80, 93, 942 P.2d 351 (1997) (stating that the purpose of the Act "was to limit causes of action for injured plaintiffs"). Before the Act, the Washington Supreme Court had declined to impose joint liability when a plaintiff's injuries resulted from multiple, unrelated accidents. See Smith v. Rodene, 69 Wn.2d 482, 484, 418 P.2d 741 (1966) (determining no joint liability where two independent torts, separated by distance and time, caused separate harms). Thus, to expand joint liability to hold defendants liable for divisible injuries would contradict the legislature's purpose in passing the Act.[30]

As referenced by the Court of Appeals in footnote 5, the decision of the trial court and Court of Appeals to apply several liability when there were multiple individual accidents and divisible damages is fully consistent

[30] *Hart v. Prather*, 2020 Wash.App. LEXIS 2365 at fn. 6.

with Washington case law regarding successive tortfeasor liability.

In successive tortfeasor cases, joint and several liability applies only "if the jury finds that the harm is indivisible."[31] Where there is no such finding of an indivisible injury, joint and several liability shall not apply to successive tortfeasors. In fact, the Washington Supreme Court recognized that joint and several liability applies only, "so long as each tort-feasor's conduct is found to have been a proximate cause of the indivisible harm."[32]

In contrast to the judgment entered by the trial Court and the decision of the Court of Appeals, both of which were consistent with the text and policy of RCW 4.22.070 and with Washington case law regarding successive tortfeasor liability, the Petition by Plaintiff Hart cites no Washington case that would expand joint and several liability to cases where there were multiple independent accidents and divisible injuries. Accordingly, there is no appropriate basis to grant the Petition for review.

C. Review Should Be Denied Because The Decision Of The Court Of Appeals To Affirm The Trial Court's Entry of Judgment Based On A Verdict Form That Allowed The Jury To Divide Damages In Accord With Four Unrelated Accidents Does Not Conflict With Any Decision From The Supreme Or Court Of Appeals And Does Not Conflict with RCW 4.22.070.

[31] *Phennah v. Whalen*, 28 Wn.App. 19, 29, 621 P.2d 1304 (1980)..

[32] *Seattle First National Bank v. Shoreline Concrete*, 91 Wn.2d 230, 236, 588 P.2d 1308 (1978) (emphasis added).

Likewise, Plaintiff Hart's criticism of the verdict form for allowing damages to be apportioned to the March 22, 2014 Powell accident provides no basis for this Court to grant review.

Verdict forms are reviewed under the same standard used for jury instructions. As such, they are not deemed erroneous "if they permit each party to argue their theory of the case, are not misleading, and when read as a whole, properly inform the trier of fact of the applicable law."[33] In *Canfield*, the court determined that no error was found in the verdict form when it failed to prevent the appealing party from arguing its theory of the case.[34] The appealing party was able to argue to the jury, both in closing and rebuttal, that if the relevant statements amounted to defamation per se, then damages could be presumed as long as they were the proximate result of the statements made.[35]

In this case, the verdict form was similarly sufficient. Plaintiff Hart was able to, and did, make her liability arguments about each corresponding accident, as well as her argument that her injuries were not divisible.[36] For example, in Plaintiff's rebuttal argument, Plaintiff's counsel referenced Question 11 on the verdict form, emphasizing the importance of the jury's

[33] *Canfield v. Clark*, 196 Wn.App. 191, 199, 385 P.3d 156 (2016).
[34] *Id.* at 201.
[35] *Id.*
[36] RP 4376-4377; 4261; and 4276.

answer to the question "Given the timeline of the collisions set forth above, were some of the plaintiff's economic and noneconomic injuries indivisible injuries?"[37] Plaintiff's counsel relayed to the jury his view that the obvious answer to this question would be "Absolutely yes."[38] In fact, the Special Verdict Form, and this question especially, provided Plaintiff a considerable benefit, in that it would have imposed joint and several liability to apply to all involved collisions, even if only some, not all, of the injuries were deemed to be indivisible.

Further question 12 regarding the March 22, 2014 Powell accident, in combination with the 11 prior questions, allowed the trial judge to enter several judgments for damages pursuant to the jury's findings that none of the injuries were indivisible. By using the language in Question 12 regarding "What percentage of the 100% is attributable to the negligence or collision," the verdict form allowed the jury to properly apportion damages between each of the collisions. When read as a whole, and with the inclusion of the jury instructions, the verdict form effectively informed the jury of the applicable law, or as stated by Plaintiff's counsel, "helped in providing needed clarity."[39]

Further, as noted by the Court of the Appeals, Question 12 on the

[37] RP 4376.
[38] RP 4376.
[39] RP February 20, 2018, Pg. 23.

verdict form did not violate RCW 4.22.070 because it was not allocating fault to Powell (who had been dismissed) but was rather allowing the jury to divide divisible damages between the four separate and distinct accidents in which Ms. Hart had been involved:

> Hart asserts that the court erred by permitting the jury to allocate fault to Powell. But this mischaracterizes the special verdict form. Question 12 on the verdict form provides, "Assume 100% represents the total of the combined fault or collisions that proximately caused plaintiff's injuries and/or damages. What percentage of the 100% is attributable to the negligence or collisions of each of the following[.]" (Emphasis added.) The special verdict form then lists the March 1, 2009 collision, defendant Stanton, defendant Nelson, defendant Barker, and the collision of March 22, 2014. Because the question allowed the jury to assign a percentage of responsibility for Hart's injuries to defendants or collisions, it was apparent from the question that the jury was not assigning fault to Powell. It also was clear to the jury that they were not assigning fault to Powell given that Question 5 stated that Powell was not negligent on March 22, 2014. Finally, Instruction 25 told the jury that Powell was not negligent but that they could consider the accident for the effect it had on Hart's injuries.
>
> As the trial court stated, the question asked the jury "to divide the damages in accordance with the four accidents, regardless of who is at fault." Because the jury considered the March 22, 2014 accident for only its effect on Hart's injuries, we conclude its inclusion on the special verdict for did not violate RCW 4.22.070.[40]

Plaintiff Hart cites no published case from the Supreme Court or Court of Appeals which would have prohibited the trial court from allowing

[40] *Hart v. Prather*, 2020 Wash.App. LEXIS 2365 at 12-13.

the jury to divide Ms. Hart's damages between all of the independent accidents in which she was involved. To do otherwise would have been contrary to Washington law because it would have made the defendants liable for damages Plaintiff sustained in the Powell accident when the actions of none of the other defendants caused the injuries that Ms. Hart sustained in that accident.

D. Review Should Be Denied Because No Substantial Public Interest Would Be Furthered By The Supreme Court Accepting Review.

The Petition should be denied for the additional reason that it presents no issue of substantial public importance that requires determination by this Court. In her Petition, Ms. Hart invites this Court to create a non-existent ambiguity in RCW 4.22.070; to ignore established Washington precedent in matters involving successive tortfeasors and multiple accidents; and to create law that could hold defendants liable for catastrophic injuries that they had no role in causing. The public interest would be best served by this Court declining that invitation and allowing the Court of Appeals decision to stand.

VI. CONCLUSION

The Court of Appeals decision was well reasoned and consistent with Washington law. Petitioner Hart has not shown that the Court of

Appeals decision is in conflict with a published decision of the Supreme Court or the Court of Appeals. Ms. Hart likewise has not shown that the Court of Appeals decision is in conflict with RCW 4.22.070. Ms. Hart has not shown that the Petition involves an issue of substantial public interest that should be determined by the Supreme Court. None of the criteria set out in RAP 13.4(b) have been met. This Court should deny the Petition for Review.

DATED this 3rd day of December, 2020.

Respectfully submitted,

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DECLARATION OF SERVICE

The undersigned certifies under penalty of perjury under the laws of the State of Washington that on I caused a true and correct copy of the foregoing ANSWER OF RESPONDENTS EMILY PRATHER AND PARKER KNAUER TO APPELLANT'S PETITION FOR REVIEW in Washington State Supreme Court Cause No. 99203-7 to be served on the parties below via email per agreement of parties.

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I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct. Executed this 3rd day of December, 2020 at Seattle, Washington.

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