



Seattle City Attorney

Peter S. Holmes

Joseph Groshong
Assistant City Attorney
(206) 684-8200
Joseph.Groshong@seattle.gov

September 30, 2020

VIA EMAIL

supreme@courts.wa.gov

Clerk of the Supreme Court
PO Box 40929
Olympia, WA 98504-0929

Re: July 2020 Proposed Rule Changes to GR 30

Dear Clerk:

I submit this letter on behalf of the Seattle City Attorney's Office as a comment on the proposed modifications to GR 30. We sincerely appreciate the opportunity to comment. Although we support modifications to the rule, we have some concerns. As noted by another commenter, changing the rule to allow for "electronic signatures" as it is defined in the Uniform Electronic Transactions Act would be preferable to the current proposed rule's use of "digital signatures".

In addition to the reasons noted by others, moving to "digital signatures" will be problematic, as not all state electronic filing systems are currently capable of accepting digitally signed documents. For instance, when my office attempted to file a digitally signed document with the Court of Appeals earlier this year, the document could not be filed. When we inquired with the Court, a Customer Service Specialist at the Administrative Office of the Courts responded: "The Washington State Appellate Courts' Portal is unable to accept documents using digital signatures (and/or) watermarks) as the pdf is locked. This will cause problems with adding the time stamp." We were required to submit the document without the digital signature contemplated by the proposed rule.

We respectfully suggest that any movement to digital signatures should be delayed until all State court filing systems are updated to allow such documents to be filed. Alternatively, use of "electronic signatures" would not appear to require updating any current system, as those documents are regularly filed without difficulty.

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Thank you again for considering our comments and suggestions.

Sincerely,

PETER S. HOLMES
Seattle City Attorney

/s/Joseph Groshong

By:

Joseph Groshong
Assistant City Attorney

From: [OFFICE RECEPTIONIST, CLERK](#)
To: [Linford, Tera](#)
Cc: [Tracy, Mary](#)
Subject: FW: Comments re July 2020 Proposed Changes to GR 30
Date: Thursday, October 1, 2020 8:16:36 AM
Attachments: [image001.png](#)
[L - Supreme Court Clerk.pdf](#)

From: Groshong, Joseph [mailto:Joseph.Groshong@seattle.gov]
Sent: Wednesday, September 30, 2020 7:19 PM
To: OFFICE RECEPTIONIST, CLERK <SUPREME@COURTS.WA.GOV>
Subject: Comments re July 2020 Proposed Changes to GR 30

Dear Clerk,

Attached please find comments from the Seattle City Attorney's Office regarding proposed changes to GR 30.

Thanks,



Joe Groshong
Assistant City Attorney
Torts Section Director

Civil Division
701 Fifth Avenue, Suite 2050
Seattle, WA 98104-7095
Phone: 206-684-8223
FAX: 206-684-8284
joseph.groshong@seattle.gov

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