IN THE COURT OF APPEALS
OF THE STATE OF WASHINGTON
DIVISION II

NO. 58881-1-II

SAVE THE DAVIS-MEEKER GARRY OAK,

Appellant,

v.

DEBBIE SULLIVAN, in her capacity of Mayor of Tumwater,

Respondent.

APPELLANT'S MOTION TO MODIFY COMMISSIONER'S RULING OF OCTOBER 8, 2024

Bryan Telegin, WSBA 46686
TELEGIN LAW PLLC
175 Parfitt Ave. SW, Ste. N270
Bainbridge Island, WA 98110
(206) 453-2884
bryan@teleginlaw.com

Ronda Larson Kramer,
WSBA # 31833
LARSON LAW PLLC
P.O. Box 7337
Olympia, WA 98507
(360) 768-0775
ronda@larsonlawpllc.com

Attorneys for Appellant Save the Davis-Meeker Garry Oak

I. IDENTITY OF MOVING PARTY

Pursuant to RAP 17.7(a), Plaintiff-Appellant Save the Davis Meeker Garry Oak ("SDMGO") seeks the relief designated in Part II.

II. RELIEF REQUESTED

On October 8, 2024, Commissioner Bearse entered a notation ruling granting Defendant Debbie Sullivan's motion to strike extra-record material from SDMGO's reply brief. *See* Notation Ruling (Oct. 8, 2024). Pursuant to RAP 17.7(a), SDMGO requests that the Commissioner's ruling be modified to allow citation to the extra-record materials described below.

III. EVIDENCE RELIED UPON

This motion relies on the pleadings and filings herein, including the materials cited within and attached to SDMGO's September 23, 2024 reply brief ("Reply. Br.").

IV. FACTS RELEVANT TO MOTION

In this appeal, SDMGO challenges a decision by Defendant Debbie Sullivan—the mayor of the City of

Tumwater—to cut down a 400-year-old Oregon white oak tree known as the Davis Meeker oak. This tree is listed as an historic property on the City of Tumwater's Register of Historic Places, having served as a trail marker on the ancient Cowlitz Trail for hundreds of years, and later the Oregon Trail. CP 16; CP 73. The Washington Department of Archeology and Historic Preservation ("DAHP") has determined that the tree is a protected archeological resource under Washington's Archeological Sites and Resources Law at chapter 27.53 RCW. CP 140. The tree is of deep cultural and historical significance to local tribal members. CP 72; CP 77–78.

As an historic property on the City of Tumwater's Register of Historic Places, the Davis Meeker oak is protected by the City's Historic Preservation Ordinance at chapter 2.62 of the Tumwater Municipal Code ("TMC"). That ordinance provides that properties on the City's historic register may not be altered or demolished without the prior approval of the Tumwater Historic Preservation Commission. TMC

2.62.060(A). The Commission may give such approval through the issuance of a so-called "certificate of appropriateness," or by waiving the certificate requirement. *Id*. The full text of the Tumwater Historic Preservation Ordinance is reproduced at Appendix A to SDMGO's opening brief.

The City of Tumwater's more general tree code—TMC chapter 16.08—similarly provides that "the cutting or clearing of historic trees requires the issuance of a certificate of appropriateness in accordance with TMC Chapter 2.62 [the City's Historic Preservation Ordinance]." TMC 16.08.070(S). Thus, both the Historic Preservation Ordinance and the more general tree code provide that historic trees like the Davis Meeker oak may not be cut down without the approval of the Historic Preservation Commission. The text of TMC chapter 16.08 may be found at Appendix B to SDMGO's reply brief.

For decades, there has been no documented tree care performed on the historic Davis Meeker oak by the City of Tumwater. CP 85. Instead, the tree has been lovingly cared for

by volunteers. *Id*. It was through the hard work of volunteers that the tree has now largely healed from injuries caused by road maintenance work that buried the tree's root flare. CP 81–82. The tree's recovery is a testament to the "quite remarkable" ability of Garry oaks to recover from past injuries and defects. CP 82–83.

The Davis Meeker oak has stood for more than 400 years. It has been a registered historic property since the 1990s. CP 82. However, in May of 2023, a limb fell from the tree, with "the tips of the limb barely cross[ing] the fog line of [Old Highway 99]." CP 80. Nobody was injured. The branch fell "almost entirely on the side of the road." CP 80. Yet, this event would later spark a campaign by some within the City's executive branch—led by Mayor Sullivan—to have the tree removed.

In the months following this incident, the City had the tree inspected by independent, third-party arborists who "recommended a pruning regiment [sic] to lower leverage on

branches over the road." CP 83. On the basis of sonic tomography, those same arborists "concluded that there was more than enough healthy wood to retain this tree." *Id*. Nevertheless, the City's own arborist later issued a report in October of 2023 recommending complete removal. CP 85. That report contained a "litany of errors." CP 79.

With this report in hand, Mayor Sullivan began a dedicated campaign to have the tree removed. Her campaign began with a request to the Tumwater Historic Preservation Commission to have the tree delisted from the City's historic register, so that the tree would no longer be protected by the Historic Preservation Ordinance. CP 90. That effort failed. The tree is still on the City's Register of Historic Places. CP 16.

The mayor then turned to the Tumwater City Council. The city attorney's office began asking the City's insurance carrier—the Washington Cities Insurance Authority ("WCIA")—to recommend removal (falsely stating to the WCIA that the tree is now "very dead"). CP 86. In March of

2024, the city attorney asked the WCIA to try and persuade the City Council to allow removal. CP 86. That effort failed too. The City Council has not approved of the mayor's plan to remove the tree. The WCIA did not recommend removal. CP 85–86.

Failing to garner the approval of the City Council or Historic Preservation Commission, Mayor Sullivan then took matters into her own hands, claiming complete and unilateral authority to decide whether the tree lives or dies. On May 21, 2024, the mayor announced that she had put out a request for bids in February to have the tree removed. CP 17. No date for removal was given. However, two days later, on Thursday, May 23, 2024, a member of SDMGO received leaked information that the mayor intended to have the tree cut down that very weekend—over the Memorial Day weekend "when everyone was out of town." CP 17.

Faced with the prospect of the tree's destruction over the Memorial Day weekend, on Friday morning, May 24, 2024,

SDMGO filed a complaint and obtained a temporary restraining order ("TRO") from the *ex parte* department of the Thurston County Superior Court. The TRO was issued by the Honorable Sharonda D. Amamilo. CP 26–27. Prior to obtaining the TRO, counsel for SDMGO attempted to contact the city attorney's office and left a voice message stating SDMGO's intent to seek a TRO. CP 15.

Later that day, the mayor's private attorney filed a motion to dissolve the TRO, and the matter was set for hearing seven days later (on shortened time) on May 31, 2024. In that motion, the mayor's attorney objected to the TRO on largely procedural grounds, including lack of notice and lack of a bond. CP 61–67. The mayor also argued, without citation to authority, that the City's Historic Preservation Ordinance "does not apply," because the tree is not a "structure." CP 64–65. On the mayor's theory, the Historic Preservation Ordinance only applies to artificial structures like buildings and houses, not natural structures and objects like trees.

On Friday, May 31, 2024, the Honorable Anne Egeler granted the mayor's motion to dissolve the TRO and also denied SDMGO's motion to extend the injunction. CP 158–64. In her ruling, Judge Egeler adopted the mayor's argument, ruling categorically that "[t]here was not an obligation to obtain a permit before removing a historic tree as opposed to a historic structure." CP 154. She added that the code "allows removal of a tree the city determines is posing a hazard." *Id*.

However, because the mayor was mobilizing to have the tree cut down as soon as the following Monday, Judge Egeler extended the otherwise-dissolved TRO until Wednesday, June 5, 2024, to "provide sufficient time to allow the plaintiffs to make an emergency motion on appeal to the Court of Appeals." CP 156.

SDMGO appealed Judge Egeler's ruling that day, and later filed a motion pursuant to RAP 8.3 to enjoin Mayor Sullivan from having the tree cut down before this appeal is resolved. Ruling on that motion, Commissioner Bearse

determined that the appropriate vehicle for enjoining the mayor on appeal was not to enter a discretionary injunction under RAP 8.3, but for SDMGO to request a supersedes bond from the superior court under RAP 8.1(B)(2). *See* Ruling Denying Stay Under RAP 8.3 Without Prejudice to Obtaining a Stay under RAP 8.1(B)(2), Determining Appealability, and Accelerating Appeal (July 23, 2024). Commissioner Bearse also granted SDMGO's request for accelerated review of this appeal under RAP 18.12. *Id*.

Following Commissioner Bearse's ruling, SDMGO filed a motion with the Thurston County Superior Court to set the amount of a supersedeas bond. Judge Egeler ruled on that motion on September 6, 2024, setting the bond amount at $10,000.00. SDMGO promptly paid the bond. Copies of Judge Egeler's order setting the bond, and SDMGO's Notice of Cash Supersedeas, are attached as Appendices D and E to SDMGO's reply brief.

Critical to this appeal, in the middle of briefing on SDMGO's bond motion, the mayor filed a motion with the superior court for an award of $13,000.00 in attorney's fees for opposing the original TRO. That motion was denied. However, in support of that motion the mayor's attorney submitted a declaration in which he explains that the mayor is no longer planning to immediately cut down the Davis Meeker oak. Instead, she is in the process of obtaining a "second opinion concerning the condition of the tree," which she will later use to "evaluate next steps concerning the Davis Meeker Garry Oak." This declaration is attached at Exhibit F to SDMGO's reply brief. Below is the full quotation:

> In the meantime [*i.e.,* subsequent to Judge Egeler's dissolution of the TRO], the City of Tumwater and Mayor Sullivan agreed to obtain ***a second opinion concerning the condition of the tree***. At the June 4, 2024 City Council meeting, Mayor Sullivan agreed to obtain a second opinion from an independent arborist to evaluate the condition of the tree. The City issued a Request for Qualifications and obtained responses through July 18, 2024. The City has contracted with an independent arborist, Todd Prager & Associates,

> to make the assessment, ***which will be used to evaluate next steps concerning the Davis Meeker Garry Oak***.

Reply Br., App. F at 3:7–13 (emphasis add).

The significance of this quote from the mayor's attorney is (a) the mayor is now openly stating that she needs a "second opinion" to evaluate the "condition of the tree"; and (b) it will be that future, second opinion which will guide future management decisions, which may fall far short of cutting the tree down in its entirety.

Despite the mayor stating publicly and to the superior court that she needs a second opinion to evaluate the tree's condition and to make a decision about its future, the mayor's response brief ("Resp. Br.") to this Court is replete with now-false statements that the Davis Meeker oak is a "known hazardous tree," that the tree has been "identified" or "determined to be hazardous," and that "[t]he decision to remove the tree is important to safeguard the public using the adjacent street." (*See, e.g.,* Resp. Br. at 1, 3, 9, 10, 40.) The

mayor claims in her brief that she must "proceed with emergency tree removal to make [the city's] streets safe for the traveling public." *Id*. at 43.

But the Davis Meeker oak is not a "known hazard." It has not been "identified" or "determined to be hazardous," except in the original arborist report for which the mayor is now seeking a "second opinion." The mayor cannot truthfully claim—now, at the present date—that she needs to "proceed with emergency tree removal." The reason is that the mayor has not obtained the very "second opinion" which she now acknowledges is needed to make any of those determinations.

Yet, in reliance on her now-false statements that the Davis Meeker oak is a "known hazardous tree" and that the only way to protect the streets is to "proceed with emergency tree removal," one of the mayor's primary defenses in this appeal continues to be that the tree qualifies for removal without approval of the Tumwater Historic Preservation Commission, based on an exception for so-called "emergency measures."

Resp. at 25–27 (citing TMC 2.62.060(B)(3)). There are several problems with this defense. First, under the code, these emergency "measures" are allowed for "repair," not destruction. Second, there is no longer any "emergency." This is because the mayor does not possess the very "second opinion" that she says will be used to evaluate the condition of the tree and to make future management decisions.

As discussed above, in its reply brief SDMGO cited the mayor's attorney's declaration, arguing specifically that it shows that no emergency presently exists:

> The mayor is similarly wrong in claiming that the Historic Preservation Ordinance itself allows an historic tree to be destroyed in a so-called "emergency." Resp. at 25–27. First, there is no "emergency." The mayor herself has essentially admitted this by stating (via her attorney's August 28, 2024 declaration to the superior court) that she is still in the process of obtaining a second opinion on the tree's condition, and that she will be using that second forthcoming assessment to guide her decision-making. App. F at 3:7–13. There can be no "emergency" before the mayor has obtained the study she says she will use to evaluate the tree's condition and to make decisions about how to manage the tree in the future.

Reply at 16. Another way of putting this is that the mayor's "emergency" defense is now moot.

On September 25, 2024, the mayor filed a motion to strike SDMGO's submittal of her attorney's declaration to this Court. The motion also sought to strike other materials outside the superior court record cited in SDMGO's reply brief. On October 8, 2024, Commissioner Bearse granted that motion in full. SDMGO now asks this Court to modify Commissioner Bearse's ruling and to allow citation to the extra-record materials discussed below, including the mayor's attorney's declaration.

V. ARGUMENT

A. SDMGO should be allowed to rely upon recent statements by the mayor that a "second opinion" is needed to evaluate the condition of the tree and to make future management decisions.

This Court should reverse the Commissioner's ruling and hold that SDMGO may rely upon the mayor's attorney's August 8, 2024 declaration, in which he admits that the mayor is currently seeking a second opinion on the condition of the

Davis Meeker oak and that this future, second opinion "will be used to evaluate next steps concerning the Davis Meeker Garry Oak."

First, the mayor's attorney's declaration shows that the mayor's "emergency" defense is now moot. Whether the mayor could truthfully have claimed an emergency requiring the tree to be entirely cut down when the TRO was dissolved in May of 2024, she cannot truthfully claim that now, having admitted that a second opinion is needed to evaluate the condition of the tree and to make a determination about how to move forward. It is the very nature of mootness problems that they arise based on the facts of the present case, not on what may or may not have been submitted at the superior court. *See, e.g., City of Sequim v. Malkasian*, 157 Wn.2d 251, 259, 138 P.3d 948 (2006) ("'The central question of all mootness problems is whether *changes in the circumstances* that prevailed at the beginning of litigation have forestalled any occasion for meaningful relief.'") (emphasis added; quoting 13A Charles Alan Wright, Arthur R.

Miller & Edward H. Cooper, Federal Practice and Procedure § 3533.3, at 261 (2d ed. 1984)).

Here, where the mayor has stated that she needs a second opinion to determine the actual condition the tree, and that she will be using that future, second opinion to make management decisions about the tree's future, there is no emergency. Those determinations cannot be made before the second opinion is rendered. The mayor's emergency defense is now moot. Any ruling by this Court on that defense would be a purely advisory opinion, based on facts that no longer represent the present reality.

A second reason why SDMGO should be allowed to rely on the mayor's attorney's declaration arises from Rule 3.3 of the Washington Rules of Appellate Procedure: "A lawyer shall not knowingly . . . make a false statement of material fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer." RPC 3.3(a)(1). This duty of candor and honesty to the court

"continue[s] to the conclusion of the proceeding," defined as "when a final judgment in the proceeding has been affirmed on appeal or the time for review has passed." RPC 3.3(b) & cmt. 13. Thus, not only is a lawyer forbidden from making a knowingly false statement of fact or law at the superior court level; a lawyer also may not do so on appeal. *See, e.g., In re Welfare of R.H.*, 176 Wn. App. 419, 429–430, 309 P.2d 620 (2013) (lawyer sanctioned for misrepresenting record in response brief and at oral argument).

In this case, the mayor's present statements in her response brief that the Davis Meeker oak is a "known hazard" and that she must engage in "emergency tree removal" to keep the streets safe are belied by her new admission that she needs a second opinion to determine the tree's actual condition, and that she will be using that second opinion to "evaluate next steps concerning the Davis Meeker Garry Oak." If these things were truly "known," then the mayor would not need a second opinion. Yet, she persists in the knowing fiction that the tree is

known to present a dramatic, present danger, necessitating its immediate and complete removal.

RAP 1.2(a) provides, in part, that "[t]he rules [of appellate procedure] will be liberally interpreted to promote justice." RAP 1.2(c) provides that "[t]he appellate court may waive or alter the provisions of any of these rules in order to serve the ends of justice." RAP 9.11(a) provides that additional evidence may be submitted on appellate review when "additional proof of facts is needed to fairly resolve the issues on review," and when "it would be inequitable to decide the case solely on the evidence already taken in the trial court." RAP 9.11(a). Here, where the mayor's response brief falsely claims that the Davis Meeker oak is a "known hazard" that needs to be immediately cut down, SDMGO should be allowed to rely on new evidence to disprove those claims. Specifically, SDMGO should be allowed to rely on her own attorney's declaration admitting that she now needs a "second opinion" to make any of those determinations.

For the reasons above, this Court should reverse the Commissioner's ruling and hold that SDMGO may continue to cite and rely upon the mayor's attorney's declaration attached as Appendix F to SDMGO's reply brief.

B. SDMGO should be allowed to rely upon the current supersedeas bond to show that the mayor's bond arguments are moot.

This Court should also reverse the Commissioner's ruling that SDMGO may not rely upon the superior court's order setting the amount of a supersedeas bond at $10,000.00, and SDMGO's Notice of Cash Supersedeas reporting that the bond has been paid.

In her response brief, the mayor argues that this Court should uphold Judge Egeler's dissolution of the original TRO issued on May 24, 2024 by Judge Amamilo, on the basis that the original TRO did not require a bond. *See* Resp. Br. at 7, 13. Under CR 65, the purpose of such a bond is to provide security in a "sum as the court deems proper, for the payment of such

costs and damages as may be incurred or suffered by any party who is found to have been wrongfully enjoined or restrained."

This is the same purpose as a supersedeas bond under RAP 8.1(b)(2), which has now been paid by SDMGO in the amount of $10,000.00. Under that rule, the purpose of a supersedeas bond is to provide security for "the amount of the loss which the prevailing party in the trial court would incur as a result of the party's inability to enforce the judgment during review." RAP 8.1(c)(2).

Whether issued under CR 65 or RAP 8.1(b)(2), the purpose of a bond is to provide security to the mayor for losses she may suffer as a result of not being able to immediately cut down the Davis Meeker oak. A bond has now been established by the superior court and paid by SDMGO as reported in Appendices C and D to SDMGO's reply brief. The mayor's bond defense is moot. This Court should reverse the Commissioner's ruling and hold that SDMGO may rely on

these extra-record materials to show that the mayor's bond defense has been rendered moot on appeal.

C. SDMGO should be allowed to rely on the July 11, 2024 AGO letter attached as Appendix C to SDMGO's reply brief.

A third extra-record document which SDMGO should be allowed to rely on consists of a letter from the Washington Attorney General's Office, on behalf of DAHP, to Jeffrey S. Meyers, the mayor's attorney, dated July 11, 2024. In this letter, the attorney for DAHP goes into great detail as to why DAHP has determined that the Davis Meeker oak is a protected archeological resource under Washington's Archeological Sites and Resources Law, chapter 27.53 RCW. This letter informs the mayor that if she persists in removing the tree without a permit from DAHP, then she will be committing a crime and "DAHP will issue penalties against the City to the maximum extent allowed by RCW 27.53.095." This letter is attached as Appendix C to SDMGO's reply brief.

The relevance of this letter arises from the parties' dispute over whether the tree is protected by Washington's Archeological Sites and Resources Law. *See, e.g.,* Resp. Br. at 31–38 (contesting SDMGO's claim that the tree is protected by state law). In its opening brief ("Op. Br."), SDMGO cited an earlier, May 30, 2024 letter from DAHP in support of its claim that the tree is a protected archeological resource under state law. Op. Br. at 13, 27. In that earlier May 30 letter (which may be found in the record at CP 140), DAHP concluded that the tree is, in fact, protected by state law. It is SDMGO's position that DAHP's determination is entitled to substantial deference as the state agency in charge of administering Washington's Archeological Sites and Resources Law. Op. Br. at 26.

However, in an attempt to disparage DAHP's May 30, 2024 letter, the mayor now repeatedly suggests or implies that it was not actually sent to the mayor. *See* Resp. Br. at 8, 31 (arguing, *inter alia*, that "[n]o deference is owed to a letter addressed by agency staff to 'whom it may concern.'"). The

Mayor also describes the May 30, 2024 DAHP letter as a "self-serving letter" obtained by SDMGO from "agency staff," implying that it was not the result of reasoned agency analysis. *Id*. at 31.

The mayor knows that both of those implications are false, as confirmed by the AGO's letter of July 11, 2024. For example, the July 11 AGO letter confirms that the earlier May 30, 2024 DAHP letter cited in SDMGO's opening brief was, indeed, addressed and delivered to the mayor. *See* Reply Br., App. C at 3 ("DAHP has now notified the City on three separate occasions that work on the Tree, including but not limited to removing or damaging the Tree, requires a Permit. *This notice first occurred by email from Assistant State Archaeologist James Macrae dated May 30, 2024*, second by letter from Assistant State Archaeologist James Macrae dated June 4, 2024, and finally by this letter.") (emphasis added). The detail and thoroughness of the July 11, 2024 AGO letter further confirm that DAHP's earlier determination was not a "self-

serving letter" from agency staff, but represents the reasoned determination of the agency itself.

In *In re Welfare of R.H.*, this Court imposed sanctions against an attorney under RPC 3.3 for "repeatedly assert[ing] in her reply brief and during oral argument that there was no evidence in the record that the children felt unsafe with their father"; and when confronted with such testimony in the record, for "maintain[ing] that the statements were simply the attorneys' arguments and, as such, not evidence." 176 Wn. App. at 430. In this case, the mayor's repeated statements and suggestions that the May 30, 2024 DAHP letter is merely a "self-serving letter" obtained by SDMGO from "agency staff," and that it was addressed to no one in particular, represents a similarly dishonest characterization of the record. Under RPC 3.3, the mayor's attorney is prohibited from making false statements or relying on evidence he knows to be false, and that duty continues until this case is resolved on appeal. Here, where the mayor and her attorney know full well that the May 30, 2024

letter was addressed and sent to the mayor, and that it was not merely a "self-serving letter" obtained from "agency staff," SDMGO should be allowed to rely on the more recent AGO letter to show that the mayor's insinuations are false.

This Court should reverse the Commissioner's ruling and hold that SDMGO may cite and rely upon the July 11, 2024 AGO letter attached as Appendix C to SDMGO's reply brief.

D. SDMGO should be allowed to rely on a June 4, 2024 letter from the Nisqually Tribe to rebut the mayor's false statement that no tribe objected to the mayor's decision to destroy the tree.

Finally, the mayor asserts in her response brief that before she decided to cut down the Davis Meeker oak, she "proceeded to inform the public and tribal officials," and that "[n]one of the tribes expressed concern at the decision to remove the tree." Resp. Br. at 4.

However, as discussed in SDMGO's Reply Brief, one tribe did object—the Nisqually Tribe wrote a letter to the Tumwater City Council (which includes the Mayor as the

presiding officer) on June 4, 2024, asking the City to delay removal so that the Tribe could "complete consultation with the State Historic preservation officer and the Tribal Historic Preservation Officer." This letter may be found at Exhibit F to the Declaration of Ronda Larson Kramer in Support of Motion for Injunctive Relief Pursuant to RAP 8.3 (filed July 2, 2024) and is quoted at pages 5 to 6 of SDMGO's Reply Brief.

The mayor knows the Nisqually Tribe objected, but she stated otherwise in her response brief, violating RPC 3.3. SDMGO should be allowed to rely on the Nisqually Tribe's letter to show that at least one tribe did, in fact, object to the mayor's hasty decision to remove the historic Davis Meeker oak.

VI. CONCLUSION

For the reasons above, this Court should reverse the Commissioner's October 8, 2024 notation ruling and hold that SDMGO may cite and rely upon the extra-record materials described above.

VII. CERTIFICATE OF COMPLIANCE

I certify that this motion contains 4,486 words, in compliance with RAP 18.17(b)

RESPECTFULLY SUBMITTED this 18th day of October, 2024.

TELGIN LAW, PLLC

Bryan Telegin
WSBA No. 46686

LARSON LAW, PLLC

Ronda Larson Kramer
WSBA No. 31833

Attorneys for Plaintiff-Appellant
Save the Davis-Meeker Garry Oak

LARSON LAW, PLLC

October 18, 2024 - 4:32 PM

Transmittal Information

Filed with Court:	Court of Appeals Division II
Appellate Court Case Number:	58881-1
Appellate Court Case Title:	Save the Davis Meeker Garry Oak, Appellant v. Debbie Sullivan, Respondent
Superior Court Case Number:	24-2-01895-3

The following documents have been uploaded:

- 588811_Motion_20241018163000D2529050_1604.pdf
  This File Contains:
  Motion 1
  The Original File Name was 2024 10 18 Motion to Modify FINAL.pdf

A copy of the uploaded files will be sent to:

- bryan@teleginlaw.com
- christopher.wright@atg.wa.gov
- jkocztorz@lldkb.com
- jmyers@lldkb.com
- lisa@lldkb.com

Comments:

Sender Name: Ronda Larson Kramer - Email: ronda@larsonlawpllc.com
Address:
PO BOX 7337
OLYMPIA, WA, 98507-7337
Phone: 360-768-0775

Note: The Filing Id is 20241018163000D2529050