

FILED  
SUPREME COURT  
STATE OF WASHINGTON  
3/25/2020 8:00 AM  
BY SUSAN L. CARLSON  
CLERK

NO. 97835-2

---

**SUPREME COURT OF THE STATE OF WASHINGTON**

---

SAID FARZAD,

Petitioner,

v.

STATE OF WASHINGTON, DEPARTMENT OF HEALTH-MEDICAL  
QUALITY ASSURANCE COMMISSION; WASHINGTON  
PHYSICIANS HEALTH PROGRAM, a Washington non-profit  
Corporation doing business in Washington State; LARRY BERG AND  
“JANE DOE” BERG, and the marital community composed thereof;  
CHRIS BUNDY AND “JANE DOE” BUNDY, and the marital  
community composed thereof; MOLINA HEALTHCARE OF  
WASHINGTON, A Washington Corporation, JOHN AND JANE DOES  
1-10,

Respondents.

---

**STATE RESPONDENTS’ ANSWER TO AMENDED PETITION  
FOR REVIEW**

---

ROBERT W. FERGUSON  
Attorney General

PATRICIA D. TODD, WSBA #38074  
SARA CASSIDEY, WSBA #48646  
Assistant Attorney General  
P.O. Box 40126  
Olympia, WA 98504-0126  
(360) 586-6300  
OID #91023

**TABLE OF CONTENTS**

I. INTRODUCTION ..... 1

II. COUNTERSTATEMENT OF THE CASE ..... 2

    A. MQAC Suspended Mr. Farzad’s Medical License..... 2

    B. MQAC Denied Mr. Farzad’s Requests to Reinstate His License ..... 4

    C. Mr. Farzad Sued State Defendants and Others ..... 5

    D. The Court of Appeals Affirmed Summary Judgment for All Defendants..... 6

III. COUNTERSTATEMENT OF THE ISSUE PRESENTED FOR REVIEW ..... 6

IV. AUGUMENT WHY REVIEW SHOULD BE DENIED ..... 7

    A. Mr. Farzad Has Failed to Concisely and Cogently Set Forth Any Issue For This Court’s Review ..... 8

    B. Mr. Farzad Has Failed to Establish Any Basis for Review by This Court under RAP 13.4, Nor Can He ..... 10

    C. Because The Trial Court Did Not Err in Granting State Defendants’ Summary Judgment, Review Should Be Denied ..... 13

V. CONCLUSION ..... 14

## TABLE OF AUTHORITIES

### Cases

|   |             |
|---|-------------|
| <i>Ashelman v. Pope</i> ,<br>793 F.2d 1072 (9th Cir. 1986) .....  | 14          |
| <i>Bercier v. Kiga</i> ,<br>127 Wn. App. 809, 103 P.3d 232 (2004) .....   | 6, 11, 12   |
| <i>Cowiche Canyon Conservancy v. Bosley</i> ,<br>118 Wn.2d 801, 828 P.2d 549 (1992) .....                                       | 12          |
| <i>Dutton v. Wash. Physicians Health Program</i> ,<br>87 Wn. App. 614, 943 P.2d 298 (1997) .....                                | 14          |
| <i>Farzad v. State of Wash. Dep't of Health</i> , No. 51340-4-II<br>10 Wn. App. 2d 1028, 2019 WL 4667963 (Sept. 24, 2019) ..... | 1, 2, 6, 11 |
| <i>Holland v. City of Tacoma</i> ,<br>90 Wn. App. 533, 954 P.2d 290 (1998) .....  | 6, 12       |
| <i>Janaszak v. State</i> ,<br>173 Wn. App. 703, 297 P.3d 723 (2013) .....   | 13          |
| <i>Jones v. Nat'l Bank of Commerce</i> ,<br>66 Wn.2d 341, 402 P.2d 673 (1965) .....   | 8           |
| <i>State v. Korum</i> ,<br>157 Wn.2d 614, 141 P.3d 13 (2006) .....  | 9           |
| <i>State v. Watson</i> ,<br>155 Wn.2d 574, 122 P.3d 903 (2005) .....  | 12          |
| <i>Wood v. Washington Navigation Co.</i> ,<br>1 Wn.2d 324, 95 P.2d 1019 (1939) .....  | 8           |

### Statutes

|                    |   |
|--------------------|---|
| RCW 4.24.510 ..... | 5 |
|--------------------|---|

|                        |       |
|------------------------|-------|
| RCW 18.71.002 .....    | 2     |
| RCW 18.71.003 .....    | 2     |
| RCW 18.130.300 .....   | 13    |
| RCW 18.130.300(1)..... | 5, 13 |
| RCW 18.130.300(2)..... | 5     |

**Rules**

|                      |              |
|----------------------|--------------|
| GR 14.1(a).....      | 12           |
| GR 15(g).....        | 7            |
| RAP 9.11(a).....     | 7            |
| RAP 9.12 .....       | 7            |
| RAP 10.3(a)(6) ..... | 6, 11        |
| RAP 13.4 .....       | 10           |
| RAP 13.4(b).....     | passim       |
| RAP 13.4(b)(1) ..... | 12           |
| RAP 13.4(b)(2) ..... | 12           |
| RAP 13.4(b)(3) ..... | 12           |
| RAP 13.4(b)(4) ..... | 12           |
| RAP 13.4(c)(5) ..... | passim       |
| RAP 13.4(c)(7) ..... | 2, 7, 10, 11 |

## I. INTRODUCTION

This is a case about protecting the public from a doctor unfit to practice medicine. Petitioner Said Farzad, a formerly licensed psychiatrist, became unable to practice with reasonable skill and safety to consumers as determined by the state disciplinary authority – the Medical Quality Assurance Commission – which suspended his medical license. The Washington Physicians Health Program, an impaired physician program that is an independent entity, also determined that Mr. Farzad could not practice medicine with reasonable safety. Those determinations remain undisturbed.

Mr. Farzad unsuccessfully sought judicial review of the suspension of his license in superior court and did not pursue any further appellate review of that decision. He then filed a separate civil action against a number of entities and individuals, including the Department of Health-Medical Quality Assurance Commission, and Larry and “Jane Doe” Berg (collectively the State Respondents or State Defendants). The trial court found State Defendants immune from suit and found that Mr. Farzad failed to produce admissible evidence demonstrating any question of material fact. The Court of Appeals affirmed that decision because Mr. Farzad provided no authority or argument related to the issue of immunity. *See Farzad v.*

*State of Wash. Dep't of Health*, No. 51340-4-II, 10 Wn. App. 2d 1028, 2019 WL 4667963 (Sept. 24, 2019) (unpublished).

This Court should deny Mr. Farzad's petition for review for several reasons. First, he fails to concisely and cogently state any issue presented for this Court's review under RAP 13.4(c)(5). Second, he identifies no basis supporting this Court's review under RAP 13.4(b), as required by RAP 13.4(c)(7). The Court of Appeals properly followed precedent in declining to consider Mr. Farzad's assignment of error related to State Defendants' immunity, and its unpublished opinion does not present an issue of substantial public interest that this Court need resolve.

## **II. COUNTERSTATEMENT OF THE CASE<sup>1</sup>**

### **A. MQAC Suspended Mr. Farzad's Medical License**

The Medical Quality Assurance Commission (MQAC) is the state disciplinary authority for medical practitioners. RCW 18.71.002, .003. It received complaints that alleged Mr. Farzad violated boundaries with two patients. CP 723. Larry Berg, an MQAC staff attorney, was assigned to work on the investigation and disciplinary proceedings related to those complaints. CP 599, 695. Mr. Farzad did not deny any of the allegations.

---

<sup>1</sup> The substance of State Defendants' Counterstatement of the Case is taken directly from the Court of Appeals opinion. *Farzad v. State of Wash. Dep't of Health*, No. 51340-4-II, 10 Wn. App. 2d 1028, 2019 WL 4667963, at \*1-2 (Sept. 24, 2019) (unpublished). Further, State Defendants hereby incorporate and adopt Washington Physicians Health Program (WPHP) Respondents' Counterstatement of the Case, Section IV, A-N.

CP 723, 726-36. Instead, he admitted to the conduct in the complaints, insisting his behavior was appropriate. *Id.* MQAC then pursued a form of disciplinary action regarding the boundary violations with a Statement of Allegations, Summary of Evidence, and a Stipulation to Informal Disposition. CP 599-600, 616-20. Mr. Farzad rejected the stipulation during this phase of the proceedings. CP 600.

MQAC next received information that Mr. Farzad had made telephone threats to Molina Healthcare. CP 600-01, 627. Mr. Farzad's threats included shooting everyone in the Molina building and bombing the building. CP 600-01. Law enforcement arrested Mr. Farzad and MQAC summarily suspended his medical license pending a hearing. CP 601, 627.

MQAC held a hearing and determined that the complaints against Mr. Farzad demonstrated an underlying mental health condition rendering him unable to practice with reasonable skill and safety. CP 601, 633-45. With everyone whom he interacted, Mr. Farzad demonstrated manipulative, controlling, and grandiose behaviors indicative of a mental state destructively contaminated by a sense of personal entitlement. CP 639.

MQAC suspended Mr. Farzad's license in order to protect the public. CP 601, 642-45. It ordered that Mr. Farzad could only apply to reinstate his license after submitting to a neuropsychological evaluation; signing releases to allow evaluators to communicate with MQAC and the

Washington Physicians Health Program (WPHP);<sup>2</sup> providing a copy of the neuropsychological evaluation to MQAC and WPHP; making an appointment with WPHP to discuss the evaluation; following WPHP's referrals for further examinations and assessments; and obtaining a report from WPHP regarding whether he was safe to return to practice or whether further treatment was necessary. *Id.* Mr. Farzad unsuccessfully petitioned the superior court for review of that order. CP 743-44.

**B. MQAC Denied Mr. Farzad's Requests to Reinstate His License**

Mr. Farzad completed neuropsychological and neurological evaluations, which raised concerns that he was suffering from a "neurodegenerative condition called front temporal lobar degeneration (FTLD), behavioral variant." CP at 828. Meanwhile, Mr. Farzad's concerning behaviors continued; this time, Mr. Farzad engaged in threatening and aggressive communication with WPHP staff. CP 831-32.

Ultimately, WPHP concluded that Mr. Farzad would not likely be able to safely return to the practice of medicine. *Id.* WPHP provided MQAC notice of its conclusion of Mr. Farzad's inability to practice medicine safely. *Id.* MQAC then denied Mr. Farzad's requests to reinstate his medical license

---

<sup>2</sup> MQAC contracted with WPHP to assist potentially impaired medical practitioners. CP 601, 643-45. Under that contract, WPHP provided the "education, assessment, intervention and referral support, client support, administration, and reporting." CP at 851.



given his demonstrated inability to safely return to the practice of medicine.  
CP 601, 633-45.

**C. Mr. Farzad Sued State Defendants and Others**

In response, Mr. Farzad filed a civil complaint against State Defendants, as well as WPHP, its director, Chris Bundy, M.D., and Molina Healthcare. CP 12-21. Mr. Farzad alleged MQAC's decision to suspend his medical license amounted to negligence, gross negligence, civil conspiracy, disparate treatment, unlawful retaliation, negligent and intentional infliction of emotional distress, libel, slander, false light, and defamation. *Id.*

State Defendants moved for summary judgment asserting immunity from suit under RCW 18.130.300(1) and the common law quasi-judicial immunity doctrine and arguing Mr. Farzad failed to produce evidence to support his claims. CP 573-97. The WPHP Respondents also moved for summary judgment alleging immunity from suit under RCW 18.130.300(2). CP 974-91. Molina moved for summary judgment asserting immunity for making reports to law enforcement under RCW 4.24.510. CP 880-95.

The superior court granted all the defendants' motions for summary judgment based on their respective claims of immunity. CP 758-60, 829-31, 922-25; VRP 16-19. It also determined that State Defendants were entitled to summary judgment because there was an absence of material fact on Mr. Farzad's claims. VRP 16-17.

**D. The Court of Appeals Affirmed Summary Judgment for All Defendants**

Mr. Farzad appealed to the Court of Appeals, which affirmed the orders granting all defendants summary judgment. *See Farzad*, 2019 WL 4667963 at \*3. The Court of Appeals identified one issue as dispositive of the case – whether the superior court had erred in concluding that the defendants were immune from suit as a matter of law. *Id.* Citing RAP 10.3(a)(6) and its own precedent, the court declined to consider that assignment of error because Mr. Farzad did not provide any argument or citation to authority regarding the defendants’ claims of immunity. *Id.* (citing *Bercier v. Kiga*, 127 Wn. App. 809, 824, 103 P.3d 232 (2004), *review denied*, 155 Wn.2d 1015 (2005); *Holland v. City of Tacoma*, 90 Wn. App. 533, 538, 954 P.2d 290, *review denied*, 136 Wn.2d 1015 (1998)). It affirmed summary judgment as a result. *Id.*

Mr. Farzad now petitions this Court for review of that decision. State Defendants oppose that request.

**III. COUNTERSTATEMENT OF THE ISSUE PRESENTED FOR REVIEW**

Where Mr. Farzad presented only a litany of factual assumptions and failed to present any argument or citation to any legal authority regarding State Defendants’ claim of immunity, did the Court of Appeals appropriately apply the well-established rule that an appellate court will not

consider issues or assignments of error that are not supported by sufficient argument or citation to authority?

#### **IV. AUGUMENT WHY REVIEW SHOULD BE DENIED**

Mr. Farzad's petition for review fails to comply with court rules and a court order. State Defendants note that Mr. Farzad, in violation of the trial court's order sealing his declaration and the exhibits attached thereto, attached to his petition certain previously-sealed medical records. *Compare* Amended Pet. at Exs. 1, 3, 5, 7, with CP 496-97, 441-42, 484-88, 490-94; CP 761-63 (Order Granting Defendants' Motion to Seal); *see also* GR 15(g) ("Court records sealed in the trial court shall be sealed from public access in the appellate court subject to further order of the appellate court."). In addition, without seeking leave from this Court under RAP 9.11(a), Mr. Farzad attached new and additional evidence to his petition, which should not be considered by this Court under RAP 9.12. *See* Amended Pet. at Exs. 2, 4, 6, 8.

Moreover, because Mr. Farzad did not meet his burden under the appellate rules to concisely set forth the issues presented for review, and his argument fails to establish why review should be accepted under RAP 13.4(b), his petition should be denied. *See* RAP 13.4(c)(5), (7). Further, review is not warranted in this case under any of the circumstances

identified under RAP 13.4(b). Therefore Mr. Farzad's petition for review should be denied.

**A. Mr. Farzad Has Failed to Concisely and Cogently Set Forth Any Issue For This Court's Review**

This Court is not required to consider issues not appropriately asserted in a petition for review. Under the appellate rules, the petitioner is required to provide "[a] concise statement of the issues presented for review." RAP 13.4(c)(5). The purpose of that rule is to have the Court accurately advised on the questions presented on appeal. *See Wood v. Wash. Navigation Co.*, 1 Wn.2d 324, 327, 95 P.2d 1019 (1939) ("Subdivision 4 of Rule XVI, Rules of the Supreme Court, covering contents and style of briefs, was enacted in the hope that, upon taking up an appellant's brief, the members of the court would be at once accurately and impartially advised as to the questions presented upon the appeal.").

Where the petitioner fails to formulate a cogent issue for review, this Court is not at liberty to redraft the issue; rather, the burden to draft a proper issue for review rests on the petitioner. *See Jones v. Nat'l Bank of Commerce*, 66 Wn.2d 341, 346, 402 P.2d 673 (1965) ("We are not at liberty to redraft the assignment of error in a form we believe the [appellant] may have intended. The burden of drafting a proper assignment of error rests upon an appellant."). Failure to clearly raise an issue within the meaning of

RAP 13.4(c)(5) will result in denial of review of that issue. *See State v. Korum*, 157 Wn.2d 614, 625, 141 P.3d 13 (2006) (where the State did not clearly raise the issue of merger of charges within the meaning of RAP 13.4(c)(5), the Court declined to consider that issue).

Here, in his petition, Mr. Farzad fails to set forth any concise and cogent issue for review by this Court as required by the appellate rules. *See Amended Pet.*, Section C. Rather, in his “Issues presented for review,” Mr. Farzad acknowledges both that “MQAC is immune to a litigation, and he is not challenging the suspension of his license.” *Id.* Then, seemingly contradictorily, Mr. Farzad requests “to know why MQAC fabricated lies about him, and stated that he had Degenerative Brain Disease and did not accept testimony from expert neurologist, psychiatrist and psychologist that he is in full mental and physical health.” *Id.* From those statements, it is impossible to accurately discern the issue or issues that he seeks to have this Court review. Neither this Court nor State Defendants should be left to guess at the questions presented in this appeal. Because Mr. Farzad failed to meet his burden under RAP 13.4(c)(5), review should be denied. *See Korum*, 157 Wn.2d at 625.

//

//

**B. Mr. Farzad Has Failed to Establish Any Basis for Review by This Court under RAP 13.4, Nor Can He**

In addition, RAP 13.4(b) identifies four exclusive circumstances when this Court will accept discretionary review of a Court of Appeals' decision terminating 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 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) (emphasis added). A petitioner must include “[a] direct and concise statement of the reason why review should be accepted under one or more of the tests established in section (b), with argument.” RAP 13.4(c)(7).

Mr. Farzad's petition for review fails to establish any basis for review as RAP 13.4 requires. Nowhere in his petition does Mr. Farzad address, either directly or indirectly, the application of any of the tests set forth in RAP 13.4(b) to the Court of Appeals' decision. *See generally* Amended Pet. Instead, throughout his petition, Mr. Farzad offers a litany of

purported facts and assumptions without any citation to the record or legal authority. Mr. Farzad’s “Argument why review should be accepted” amounts to a single paragraph proclaiming that, “[a]fter this severe injustice on his behalf done by MQAC . . . [Dr. Farzad] lost all his wealth, went through a divorce and bankruptcy, and remains a destitute.” *Id.* at Section E. That is insufficient to comply with RAP 13.4(c)(7).

This Court and State Defendants should not be made to speculate which, if any, of the exclusive circumstances for review set forth in RAP 13.4(b) Mr. Farzad believes apply in this case. Just as failure to comply with RAP 13.4(c)(5) will result in the denial of review, so too should failure to comply with RAP 13.4(c)(7). Because Mr. Farzad has failed to provide any argument or authority as to why review is required under RAP 13.4(b), his petition should be denied.

Further, as none of the circumstances identified in RAP 13.4(b) are present in this case, review of the Court of Appeals’ opinion is not warranted. In declining to consider the issue of immunity raised by Mr. Farzad in his brief, the Court of Appeals applied the well-established rule of not considering issues or assignments of error that are not supported by sufficient argument or citation to legal authority, as required by RAP 10.3(a)(6). *See Farzad*, 2019 WL 4667963 at \*3. The Court of Appeals relied on its own published precedent of *Bercier*, 127 Wn. App. at

824 and *Holland*, 90 Wn. App. at 538, which is in accord with precedent of this Court. *See Cowiche Canyon Conservancy v. Bosley*, 118 Wn.2d 801, 809, 828 P.2d 549 (1992) (noting that “the private plaintiffs present no argument in their opening brief on any claimed assignment. . . . Accordingly, the assignment of error is waived.”). As the Court of Appeals’ opinion does not conflict with either a decision of this Court nor its own published precedent, neither RAP 13.4(b)(1) nor (2) is applicable in this case.

In addition, the opinion of the Court of Appeals does not involve a significant question of law under the Washington or United States constitutions, *see* RAP 13.4(b)(3), nor does the unpublished opinion, which is not precedent and is not binding on any court under GR 14.1(a), raise any reviewable issue of substantial public interest that should be determined by this Court, *see* RAP 13.4(b)(4). While a decision that has the potential to affect a number of proceedings in the lower courts may warrant review as an issue of substantial public interest, *see State v. Watson*, 155 Wn.2d 574, 577, 122 P.3d 903 (2005), this is not such a case. Here, the opinion at issue applies settled law to unique and particular facts related to the quality of Mr. Farzad’s briefing before the court. Given the particularized nature of those facts and the unpublished status of the opinion, the Court of Appeals’



analysis does not present an issue of substantial public interest that this Court needs to address.

Mr. Farzad filed fifty-eight pages of material not in conformance with the appellate rules and devoid of any law, citations, argument, or authority as to why he alleged the Court of Appeals erred. There is no reason for this Court to disturb the reasoned decision of the Court of Appeals, and review should be denied.

**C. Because The Trial Court Did Not Err in Granting State Defendants Summary Judgment, Review Should Be Denied**

Finally, should this Court be otherwise inclined to grant review of the Court of Appeals' decision and its analysis related to Mr. Farzad's inadequate briefing before it, the decision should nonetheless be affirmed on the merits. The trial court correctly determined that immunity and Mr. Farzad's failure to create a question of material fact entitled State Defendants to summary judgment. *See* VRP 16-18. For example, State Defendants are immune from suit for their actions related to Mr. Farzad's license under both a statutory grant of absolute immunity and under the doctrine of quasi-judicial immunity. *See* RCW 18.130.300(1); *Janaszak v. State*, 173 Wn. App. 703, 714-19, 297 P.3d 723 (2013) (discussing immunity under RCW 18.130.300 and holding it applied to the Dental Quality Assurance Commission, the State, and the Department of Health

and its investigator); *Dutton v. Wash. Physicians Health Program*, 87 Wn. App. 614, 619, 943 P.2d 298, 300 (1997) (holding that quasi-judicial immunity extended from the Medical Disciplinary Board to the State and Department of Health); *Ashelman v. Pope*, 793 F.2d 1072, 1078 (9th Cir. 1986) (explaining that “[t]o foreclose [judicial and prosecutorial] immunity upon allegations that judicial and prosecutorial decisions were conditioned upon a conspiracy or bribery serves to defeat these policies.”).

Because this alternative basis for affirming the Court of Appeals’ decision would obviate any need for this Court to reverse the summary judgment in favor of State Defendants, discretionary review should be denied.

## V. CONCLUSION

This Court should decline Mr. Farzad’s invitation that it accept discretionary review of an inadequate petition, where no issue is concisely or cogently stated and no basis for review under RAP 13.4(b) is sufficiently established or, indeed, even exists. Review should be denied.

RESPECTFULLY SUBMITTED this 25th day of March, 2020.

ROBERT W. FERGUSON  
Attorney General

*s/ Patricia Todd*  
PATRICIA TODD, WSBA #38074  
Assistant Attorney General

## DECLARATION OF FILING AND SERVICE

I declare under penalty of perjury in accordance with the laws of the state of Washington that on the below date the preceding **STATE RESPONDENTS' ANSWER TO AMENDED PETITION FOR REVIEW** was electronically filed in the Washington State Supreme Court and electronically served on the following parties, according to the Court's protocols for electronic filing and service:

Said Farzad, Plaintiff *pro se*  
sfarzad1950@gmail.com

Chris Bundy, Co-Defendant  
c/o Justin A. Steiner  
Mullin, Allen & Steiner PLLC  
jsteiner@masattorneys.com

Molina Healthcare, Co-Defendant  
c/o Timothy J. Parker  
Carney Badley Spellman  
parker@carneylaw.com  
awilliams@carneylaw.com  
doyle@carneylaw.com  
anderson@carneylaw.com  
saiden@carneylaw.com

I further declare that I electronically mailed the preceding document to the addresses listed above.

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

DATED this 25th day of March, 2020, at Tumwater, Washington.

*s/ Erika Summers*  
\_\_\_\_\_  
ERIKA SUMMERS, Legal Assistant

**ATTORNEY GENERAL'S OFFICE, TORTS DIVISION**

**March 25, 2020 - 6:43 AM**

**Transmittal Information**

**Filed with Court:** Supreme Court  
**Appellate Court Case Number:** 97835-2  
**Appellate Court Case Title:** Said Farzad v. State of WA, Dept. of Health-Medical Quality Assurance, et al.  
**Superior Court Case Number:** 17-2-07459-0

**The following documents have been uploaded:**

- 978352\_Answer\_Reply\_20200325063913SC285560\_7517.pdf  
This File Contains:  
Answer/Reply - Answer to Petition for Review  
*The Original File Name was Answer2AmdPetition.pdf*

**A copy of the uploaded files will be sent to:**

- anderson@carneylaw.com
- apryl.parker@atg.wa.gov
- awilliams@carneylaw.com
- doyle@carneylaw.com
- erika.summers@atg.wa.gov
- jsteiner@masattorneys.com
- parker@carneylaw.com
- saiden@carneylaw.com
- sara.cassidey@atg.wa.gov
- sfarzad1950@gmail.com
- tduany@masattorneys.com

**Comments:**

---

Sender Name: Erika Summers - Email: erikas2@atg.wa.gov

**Filing on Behalf of:** Patricia D Todd - Email: Patricia.Todd@atg.wa.gov (Alternate Email: )

Address:  
PO Box 40126  
Olympia, WA, 98504-0126  
Phone: (360) 586-6300

**Note: The Filing Id is 20200325063913SC285560**