

IN THE COURT OF APPEALS
OF THE STATE OF WASHINGTON

DIVISION TWO

FISH NORTHWEST,

Respondent/Cross-Appellant,

v.

WASHINGTON DEPARTMENT OF FISH & WILDLIFE,

Appellant/Cross-Respondent

RESPONDENT/CROSS-APPELLANT'S

OPENING BRIEF

Joe D. Frawley, WSBA No. 41814
LACEY LAW GROUP, PLLC
Attorney for Respondent/Cross-Appellant
1415 College St. SE
Lacey, WA 98503
Telephone: (360) 491-6666
Fax: (360) 456-3632
Email: joe@laceylawgroup.com

TABLE OF CONTENTS

	Page(s)
TABLE OF AUTHORITIES.....	4
I. INTRODUCTION.....	5
II. ISSUES PRESENTED.....	6
III. STATEMENT OF THE CASE.....	7
A. WDFW Enacts Rules to Regulate Fishing on an Annual Basis.....	7
B. The Agreement Between WDFW and the Treaty Tribes is Reached Based on a Process Developed under <i>U.S. v. Washington</i>	10
1. A Harvestable Share Must be Calculated.....	14
2. 50/50 Sharing of the Harvestable Surplus is Required.....	15
3. In Season Reports Are Required.....	16
4. Equitable Adjustment is Required.....	18
IV. ARGUMENT.....	19

A.	The Superior Court Erred by Treating Fish Northwest’s APA Claim as an Attempt to Enforce a Federal Consent Decree.....	19
B.	WDFW Fails to Adequately Consider the PSSMP and the Broad Requirements of <i>U.S. v. Washington</i> , If It Does So at All, and the Rules Must Be Invalidated.....	21
C.	By Declining to Reach the Merits, the Superior Court Foreclosed Required APA Review.....	23
V.	CONCLUSION.....	29

TABLE OF AUTHORITIES

Page(s)

Cases

*Nw. Sportfishing Indus. Ass'n v.
Washington Dep't of Ecology,*
172 Wash. App. 72, 288 P.3d 677 (2012) 25 & 26

*Port of Seattle v. Pollution Control
Hearings Bd,*
151 Wash.2d 568, 90 P.3d 659 25

*Puget Sound Harvesters Ass'n v.
Washington State Dep't of Fish & Wildlife,*
157 Wash. App. 935, 239 P.3d 1140 (2010) 22 & 27

*Simpson Tacoma Kraft Co. v.
Dep't of Ecology,*
119 Wash. 2d 640, 835 P.2d 1030 (1992) 25

United States v. Washington,
384 F.Supp. 312.....5, 6, 10, 12, 15, 17, 21,
..... 22, 24, 27, 28 & 29

Statutes

RCW 34.05.570.....6, 21, 23, 24 & 25

I. INTRODUCTION

This appeal concerns the scope of judicial review under Washington’s Administrative Procedure Act (“APA”)¹. Fish Northwest challenged WDFW’s 2024 salmon rulemaking as arbitrary and capricious, alleging that the agency failed to follow state-side obligations it invokes as part of its co-management framework, including requirements under federal law and procedures and commitments reflected in the Puget Sound Salmon Management Plan (“PSSMP”) and *U.S. v. Washington*.

The superior court did not reach the merits. Instead, it concluded it lacked authority to consider the claim because doing so would amount to enforcing a federal consent decree entered in *United States v. Washington*. CP 364. On that basis alone, the court rejected Fish Northwest’s *U.S. v. Washington*-based challenge.

¹ Fish Northwest will respond to WDFW’s Opening Brief in a future brief.

That ruling was erroneous. Fish Northwest does not seek to interpret, modify, or enforce the federal decree, nor does it seek relief against any tribal party. It seeks only state-law APA review of WDFW's rulemaking—specifically, whether the agency acted arbitrarily or capriciously by disregarding the basic legal requirements, procedures and analytical framework it represents guide its decisions. Such review falls squarely within the authority of state courts and does not intrude on federal jurisdiction.

By declining to consider the claim, the superior court foreclosed the APA review that the legislature expressly requires. *See* RCW 34.05.570(1)(a). This Court should reverse and remand for adjudication of the claim on the merits.

II. ISSUES PRESENTED

1. Whether a state court retains authority under the APA to review WDFW's rulemaking for arbitrariness where the challenge alleges the agency failed to follow state-side

obligations and procedures associated with its co-management framework, including those reflected in the PSSMP and required by *U.S. v. Washington*.

2. Whether Fish Northwest’s requested relief—APA review of WDFW’s rulemaking and invalidation of the rules if the rules are unlawful—can be granted without interpreting, modifying, or enforcing the federal consent decree in *United States v. Washington*.

3. Whether the superior court erred by declining to reach the merits of the APA claim and instead declining to address it based on a perceived lack of authority.

III. STATEMENT OF THE CASE

A. WDFW Enacts Rules to Regulate Fishing on an Annual Basis.

WDFW conducts an annual rulemaking process governed by the Administrative Procedure Act. AR-001456-001457. In 2024, a CR-101 notice of rulemaking was published in January. AR-001457. WDFW then developed the rules it enacted.

Generally, WDFW and the Treaty Tribes estimated the number of fish that would return that year, and they then crafted seasons based on the number of returning salmon. AR-001457-001458. For the commercial seasons, WDFW acknowledges that it negotiated the seasons with the Treaty Tribes (i.e., Indian tribes with the rights to fish that were reserved by the tribes in their treaties with the United States). AR-001459. The commercial season was the result of “the state-tribal government-to-government negotiation...” *Id.*

AFTER the seasons were developed, WDFW issued a notice of the “proposed” rules. AR-001459. The proposed rules are identical to the agreement between the Treaty Tribes and WDFW. AR-000001-000106. The public input portion of the APA process then proceeded, and a final hearing on the “proposed” rules was set for June 4, 2024. AR-001513.

To understand this seemingly backward process, the Court must understand that the seasons cannot proceed without

authorization from the Department of Commerce to harvest species listed under the Endangered Species Act (“ESA”). *See, e.g.*, AR-000257. As the seasons are developed, the National Marine Fisheries Service conducts an analysis under the ESA to approve the killing of listed salmon and other species. *Id.* This ultimately results in a Biological Opinion and Incidental Take Statement (“ITS”) that allows fishing to occur. *Id.* at AR-000257-000258. The ITS includes “non-discretionary terms and conditions that must be implemented to provide an exemption from the prohibited acts outlined in Section 9 of the ESA.” AR-000258. The prohibited acts include fishing that may harm or kill listed species, meaning no fishing may occur except that authorized by the ITS.

To state the obvious, the fishing seasons must match the seasons analyzed by NMFS. This is an important point for the Court to understand, because the ITS was issued on May 21, 2024. AR-000257. This means that the development and

authorization for the fishing seasons was complete, and could not be changed, well before the conclusion of the public input process. By the time the public sees the “proposed” seasons, WDFW has already reached an agreement with the Treaty Tribes and NMFS and cannot change the season. The agreement is the sole basis for the rules.

B. The Agreement Between WDFW and the Treaty Tribes is Reached Based on a Process Developed under *U.S. v. Washington*.

WDFW and the Treaty Tribes co-manage salmon and steelhead fisheries. WDFW describes the relationship as follows:

Washington's salmon, steelhead, and other fisheries are managed cooperatively in a unique government-to-government relationship. One government is the State of Washington, and the other are Indian nations whose rights were reserved in treaties signed with the federal government in the 1850s. In those treaties, tribal nations agreed to allow the

peaceful settlement of much of western Washington, and provided the land to do so, in exchange for their continued right to fish, gather shellfish, hunt and exercise other sovereign rights. A 1974 federal court case (*U.S. v. Washington*, decided by U.S. District Court Judge George Boldt, and following sub-proceedings) re-affirmed the tribes' treaty rights to harvest salmon, steelhead, and other fish species and established them as co-managers of Washington fisheries.

Today, WDFW and the tribes work together to conserve and sustainably manage fish populations to provide opportunities for recreational, commercial, and ceremonial and subsistence harvest. Visit our North of Falcon webpage for information on current fisheries, including the state/tribal list of agreed fisheries (LOAF).

“Salmon and Steelhead Co-Management,” <https://wdfw.wa.gov/fishing/tribal/co-management> (last visited May 28, 2025).

Without going into great detail, which would likely require dozens of pages of briefing², the Treaty Tribes enforced their right to harvest fish, as reserved by their respective treaties, in litigation known as *U.S. v. Washington*. *U.S. v. Washington* is a case that was filed, and which remains active, in the United States District Court, Western District of Washington.

U.S. v. Washington became known as the “Boldt Decision.” *Id.* For perhaps its most basic holding, the court had to determine the meaning of the term “in common with,” which was included in the treaties at issue. Judge Boldt held:

By dictionary definition and as intended and used in the Indian treaties and in this decision "in common with" means sharing equally the opportunity to take

² Fish Northwest is more than willing to provide additional briefing if doing so would aid the Court.

fish at "usual and accustomed grounds and stations"; therefore, non-treaty fishermen shall have the opportunity to take up to 50% of the harvestable number of fish that may be taken by all fishermen at usual and accustomed grounds and stations and treaty right fishermen shall have the opportunity to take up to the same percentage of harvestable fish, as stated above.

CP 111. The result seems clear and simple: the Treaty Tribes are entitled to fifty percent of the harvestable number of salmon, and the non-treaty citizens of Washington are entitled to the other fifty percent.

That simple holding has turned out to be anything but simple. Judge Boldt wisely retained jurisdiction over the dispute (which continues today, more than half a century after the case was filed). As the dispute continued, Judge Boldt eventually

issued an order adopting the PSSMP.³ CP 215-217. That order was issued on October 17, 1985. *Id.*

The PSSMP was adopted to resolve conflicts between the State of Washington and the Treaty Tribes regarding how to set fishing seasons and ensure fifty-fifty catch sharing. It included the nuts and bolts of how seasons were to be set. The PSSMP “is intended to ensure that treaty fishermen and non-treaty fishermen, subject to their respective regulatory authorities, shall be afforded the opportunities to harvest their shares as determined in *United States v. Washington*, 384 F.Supp. 312, aff’d 520 F.2d 676 (9th Cir. 1975), cert denied 423 U.S. 1086...;” CP 223. The PSSMP governs all fisheries, both recreational and commercial. CP 225.

³ Despite the PSSMP remaining a binding order (it has not been revised, withdrawn or otherwise made ineffective), the PSSMP was not included in the record transmitted to the Court. This demonstrates the lack of attention to the PSSMP that WDFW is guilty of. WDFW does not even claim that the PSSMP was considered and does not provide it for the Court’s review.

The PSSMP's very purpose is to ensure an orderly division of the harvestable salmon and to ensure the Treaty Tribes and nontreaty citizens of Washington each catch fifty percent of the harvestable salmon. The following provisions are at issue here:

1. A Harvestable Share Must be Calculated.

The PSSMP provides that “[s]hares shall be computed separately for each species and region of origin, unless otherwise agreed by all affected parties.” CP 247. The PSSMP further provides that shares “will be calculated annually post-season” “no later than one month after the date of the post-season audit report.” CP 248. There is no documentation in the record that any of this was done.

2. 50/50 Sharing of the Harvestable Surplus is Required.

U.S. v. Washington and the PSSMP require equal sharing of the harvestable salmon. CP 112; CP 223. Equal sharing did not occur, and there is nothing in the record to reflect equal

sharing. Neither the post-season calculation of shares nor the post-season audit report is contained in the record for the 2024 season-setting process or for any recent year. There is no evidence in the record that WDFW considered the legally required equal sharing of salmon as required by both the PSSMP and the Boldt Decision itself.⁴

3. In Season Reports Are Required.

There are several requirements found in the PSSMP. Section 5.0, titled Technical and Management Reports, states that “[t]he timely exchange of information and management recommendations is vital for the preparation of management options as well as for the review and performance auditing of the management actions undertaken by the parties.” CP 238. Section 5.0 further states “[m]anagement reports and documents

⁴ The fact that 50/50 sharing is required by the Boldt Decision itself, and not just the PSSMP, alone requires the reversal of the trial court. WDFW would be required to consider the 50/50 catch sharing ordered by Judge Boldt even if the PSSMP had never been adopted.

prepared by the parties facilitate the management process...” *Id.*

To facilitate effective management of fisheries by the treaty tribes and WDFW, the PSSMP requires that a series of reports be prepared annually. WDFW and the treaty tribes are also required, under Section 5.2.3, to create a pre-season report containing methods to provide in-season estimates of run size and allocation to ensure catch sharing and conservation objectives are being met. CP 241.

Another such report is the post-season audit report, which the order and PSSMP require because it is “necessary to permit an assessment of the parties’ annual management performance in achieving spawning escapement, enhancement, harvest and allocation objectives.” CP 242. The report “shall be prepared in accordance with the schedule in Section 6,” which sets forth specific dates by which the various reports must be completed. *Id.*; CP 243.

4. Equitable Adjustment is Required.

As part of the annual review process, the PSSMP requires that “shares will be calculated annually post-season, using preliminary data, by no later than one month after the date of the post-season audit report.” CP 248. In order to deter either treaty or non-treaty fishers from harvesting more than the 50/50 allocation dictated by *U.S. v. Washington*, “[d]efficiencies in shares shall be adjusted annually unless neither party exceeded its share by more than 5% of the total of both parties’ shares.” *Id.* Section 10.5 requires that “[a]djustments calculated pursuant to subsection 10.4 shall be made during the next year, or in as few years as possible...” *Id.* The PSSMP further provides that if “treaty or non-treaty fishermen are not provided the opportunity to harvest their share of any given allocation unit as provided by the orders of the federal court deficiencies in numbers of fish shall be made up as provided in subsections 10.4 and 10.5.” CP 247. As discussed above, there is no computation of shares in

the record. The absence of share computations in the record, during the pre-season planning period or the post-season audit time frame, is proof that WDFW has no intention of complying with requirements of the PSSMP and *US v. Washington*, and it failed to do so in 2024.

IV. ARGUMENT

A. The Superior Court Erred by Treating Fish Northwest's APA Claim as an Attempt to Enforce a Federal Consent Decree.

This case began as a straightforward APA challenge to agency rulemaking. Fish Northwest alleged that WDFW's 2024 salmon rules were arbitrary and capricious because the agency failed to follow procedures and analytical requirements that it represents guide its decisions. WDFW does not even bother to argue that it considered the 50/50 catch sharing requirement of the Boldt Decision. Fish Northwest's allegations were directed at WDFW's rulemaking record and the agency's own stated framework for managing fisheries.

The superior court, however, did not analyze the claim in those terms. Instead, it recharacterized the challenge as an effort to enforce the federal consent decree in *United States v. Washington*. The trial court entirely ignored that the 50/50 requirement exists independent of the PSSMP. On that basis, it declined to consider the claim at all, concluding it lacked authority to enforce a federal decree. CP 364.

That reframing was mistaken. Fish Northwest does not seek to enforce the decree, obtain relief against any tribal party, or alter the terms of federal orders. It seeks only state-law review of WDFW's rulemaking—specifically, whether the agency acted arbitrarily or capriciously by failing to follow the procedures and analytical framework it invokes as part of co-management.

Those are distinct inquiries. Enforcing a federal consent decree involves compelling compliance with federal court orders and adjudicating the rights and obligations of parties to that decree. APA review, by contrast, asks whether a state agency has

engaged in reasoned decision-making based on the record before it. The latter inquiry falls squarely within the authority of state courts.

Indeed, WDFW's own rulemaking process provides the benchmarks for that review. The agency relies on the North of Falcon process, PFMC coordination, ESA consultation, and resulting LOAF to develop its rules. Those steps require the agency to evaluate available data, calculate impacts, and apply conservation constraints. Whether WDFW reasonably performed those tasks—and explained its decisions in the record—is a question of state administrative law, not federal decree enforcement.

Nothing about that inquiry requires a court to interpret or enforce the federal decree. A court can determine whether WDFW's rulemaking record reflects reasoned decision-making without adjudicating tribal rights or compelling any party's compliance with federal orders. By collapsing these distinct

concepts, the superior court avoided the analysis the APA requires.

B. WDFW Fails to Adequately Consider the PSSMP and the Broad Requirements of *U.S. v. Washington*, If It Does So at All, and the Rules Must Be Invalidated.

In a proceeding involving review of a rule, the reviewing court shall declare the rule invalid only if it finds that (1) the rule violates constitutional provisions; (2) the rule exceeds the agency's statutory authority; (3) the rule was adopted without compliance with statutory rule-making procedures; or (4) the rule is arbitrary and capricious. RCW 34.05.570(2)(c); *Puget Sound Harvesters Ass'n v. Washington State Dep't of Fish & Wildlife*, 157 Wash. App. 935, 944–45, 239 P.3d 1140, 1144–45 (2010). An agency action is arbitrary and capricious if it is willful and unreasoning and taken without regard to the attending facts or circumstances. *Id.*

Fish Northwest's contention here is simple: WDFW must consider and comply with *U.S. v. Washington* and the PSSMP.

If it does not, it is ignoring federal law and acting arbitrarily and capriciously. WDFW must calculate harvestable shares, produce the reports required by the PSSMP, seek 50/50 catch sharing and enforce the adjustments to shares based on deficiencies in one party's catch. If the non-treaty fisherman catches more than their share, the Treaty Tribes are entitled to an adjustment the next year. The converse is true if the Treaty Tribes catch more than their fair share. This data is not in the record, however, because WDFW has entirely abandoned the requirements of the PSSMP and Boldt Decision.

There is nothing in the records to demonstrate that WDFW calculated harvestable shares. This is true for both preseason and postseason calculations: no harvestable shares were calculated. None of the various reports required by the PSSMP are in the record. There is no evidence that WDFW sought a fifty percent share of the harvestable number of fish for the non-treaty citizens of Washington, and there is no evidence of what share of the

harvest the treaty and non-treaty fishers either were expected to catch or did catch. WDFW has entirely abandoned following the PSSMP and Boldt Decision.

C. **By Declining to Reach the Merits, the Superior Court Foreclosed Required APA Review.**

The APA does not permit a court to decline review simply because an agency's actions occur within a broader regulatory or legal framework. To the contrary, the statute requires courts to review the agency record and determine whether the challenged rules are arbitrary, capricious, or otherwise contrary to law. RCW 34.05.570(1)(a).

It is very common for state agencies to enact rules to implement federal law. The Governor's Office for Regulatory Innovation and Assistance describes rules as intended to "implement, interpret, apply or enforce a state or federal law or court decision." Governor's Office for Regulatory Innovation & Assistance, Rulemaking Process, (Oct. 13, 2025, 11:47 am) https://www.oria.wa.gov/site/alias__oria/448/rulemaking-

process.aspx. The Court should note that that CR 102 form (which is the notice given by an agency of a proposed rule – *see* AR 001514) includes a box to check if the proposed rule is the result of a federal court ruling. In this case, the federal court decision at issue is the Boldt Decision in *U.S. v. Washington*.

A commonly litigated example is the Washington Department of Ecology’s rulemaking and actions to implement the Federal Clean Water Act. *See, e.g.*, Wash. Dept. of Ecology, Water Quality, Oct. 13, 2025, 11:59 am, <https://ecology.wa.gov/about-us/who-we-are/our-programs/-water-quality> (stating that “[w]e carry out the Federal Clean Water Act for the state...”); *Port of Seattle v. Pollution Control Hearings Bd*, 151 Wash.2d 568, 90 P.3d 659; *Simpson Tacoma Kraft Co. v. Dep’t of Ecology*, 119 Wash. 2d 640, 649, 835 P.2d 1030, 1035 (1992) (issuing a declaratory judgment invalidating water quality standards under RCW 34.05.570(2)(c) for failure to follow rule-making procedures).

The issue here is analogous to *Nw. Sportfishing Indus. Ass'n v. Washington Dep't of Ecology*, 172 Wash. App. 72, 288 P.3d 677, 687 (2012). In that case, Ecology refused a petition for rulemaking. *Id.* at 88-89. The plaintiffs filed suit under RCW 34.05.570 and argued that Ecology's denial of the petition was arbitrary and capricious. *Id.* The Court ruled that, in implementing the Clean Water Act, Ecology had not acted arbitrarily and capriciously because it neither failed to consider nor misinterpreted relevant studies. *Id.* at 92-104 (Ecology considered many studies in coming to its conclusion). Conversely, and as is the case here, if Ecology had failed to consider the facts, its action would have been ruled arbitrary and capricious by the state court.

The takeaway from *Nw. Sportfishing Indus. Ass'n v. Washington Dep't of Ecology* is that the state courts applied RCW 34.05.570 and the arbitrary and capricious standard to rulemaking that was done expressly to implement federal law. It

is nonsensical to think that WDFW's rulemaking proceedings, expressly undertaken to implement federal law, are exempt from the arbitrary and capricious standard, and WDFW has cited no authority to that effect.

Thus, the result is clear. Federal law requires "that non-treaty fishermen shall have the opportunity to take up to 50% of the harvestable number of fish that may be taken by all fishermen at usual and accustomed grounds and stations and treaty right fishermen shall have the opportunity to take up to the same percentage of harvestable fish..." CP 111. Among other failures, WDFW does not dispute that it failed to consider what fifty percent (50%) of the harvestable fish would be when it conducted rulemaking or that it did not consider any of the reports or processes required by the PSSMP. WDFW's response to this brief will include no citation to evidence in the record to demonstrate it calculated fifty percent of the harvestable fish or

that followed the requirements of the PSSMP because there is nothing in the record to support such an argument.

An agency action is arbitrary and capricious if it is willful and unreasoning and taken without regard to the attending facts or circumstances. *Puget Sound Harvesters Ass'n v. Washington State Dep't of Fish & Wildlife*, 157 Wash. App. 935, 944–45, 239 P.3d 1140, 1144–45 (2010). Entirely failing to consider the core ruling of *U.S. v. Washington*, 50/50 catch sharing, when setting salmon fishing seasons is blatantly arbitrary, as is ignoring the requirements of the PSSMP. WDFW does not dispute its failures.

Here, the trial court never considered whether WDFW's application of federal law was arbitrary and capricious. Once the superior court concluded it lacked authority to enforce the federal decree, it stopped its analysis. It did not examine whether WDFW followed the procedures it identified as governing its decisions, whether it considered the relevant data, whether it

provided a reasoned explanation for its choices or whether it sought to implement 50/50 catch sharing. CP 364.

That was error. Fish Northwest's claim falls squarely within the scope of APA review: it challenges the adequacy of WDFW's decision-making process and the sufficiency of the agency's explanation in the rulemaking record. The fact that WDFW's framework is informed by co-management obligations references to the PSSMP and is required by *U.S. v. Washington* does not transform the claim into one for federal decree enforcement.

Nor does Fish Northwest's inability to intervene in the federal proceeding alter the analysis. The federal court's denial of intervention reflects limits on who may participate in enforcement of the decree. It does not deprive state courts of their independent obligation to review state agency action under state law.

The consequence of the superior court's ruling was to leave WDFW's rulemaking effectively unreviewable under the APA. The public effectively has no say in how WDFW implements *U.S. v. Washington*. That result is inconsistent with the statute, which guarantees judicial review of agency action and assigns courts the responsibility to ensure that such action is reasoned and lawful.

The proper course is reversal and remand so that the superior court can perform that review in the first instance—examining the agency record, applying the APA standards, and determining whether the rules are valid.

V. CONCLUSION

For these reasons, the Court should reverse the superior court's ruling that it lacked authority to consider Fish Northwest's challenge to WDFW's failure to consider *U.S. v. Washington* and the PSSMP. The case should be remanded with instructions to address the claim on the merits, including whether

WDFW's 2024 rules are arbitrary, capricious, or otherwise unlawful in light of the state-side obligations associated with the PSSMP and *U.S. v. Washington*.

DATED this 15th day of April, 2026.

Respectfully submitted,

s/ Joe D. Frawley
JOSEPH D. FRAWLEY, WSBA #41814
Attorney for Respondent/Cross-Appellant
1415 College Street SE
Lacey, WA 98503-2655
Tel.: 360.491.6666

CERTIFICATION OF COMPLIANCE

This document contains 3,905 words, excluding the parts of the document exempted from the word count by RAP 18.17(b), as calculated by the word-processing system used to prepare this brief.

DATED this 15th day of April, 2026.

s/ Joe D. Frawley
JOSEPH D. FRAWLEY, WSBA #41814
Attorney for Respondent/Cross-Appellant
1415 College Street SE
Lacey, WA 98503-2655
Tel.: 360.491.6666

JOE FRAWLEY, P.S.

April 15, 2026 - 2:43 PM

Transmittal Information

Filed with Court: Court of Appeals Division II
Appellate Court Case Number: 61554-1
Appellate Court Case Title: Fish Northwest, Respondent/Cross-Appellant v. Washington
Department of Fish & Wildlife, Appellant
Superior Court Case Number: 24-2-03376-6

The following documents have been uploaded:

- 615541_Briefs_20260415144125D2104027_5486.pdf
This File Contains:
Briefs - Respondents/Cross Appellants
The Original File Name was Opening Brief.pdf

A copy of the uploaded files will be sent to:

- RESOlyEF@atg.wa.gov
- fwdef@atg.wa.gov
- joe.panesko@atg.wa.gov
- tricia@laceylawgroup.net

Comments:

Sender Name: Joseph Frawley - Email: joe@laceylawgroup.net
Address:
1415 COLLEGE ST SE
LACEY, WA, 98503-2655
Phone: 360-491-6666

Note: The Filing Id is 20260415144125D2104027