NO. 98824-2

SUPREME COURT OF THE STATE OF WASHINGTON

CITY OF SEATTLE,

Respondent and Cross-Petitioner,

v.

STEVEN LONG,

Petitioner and Cross-Petitioner.

AMICUS BRIEF OF NORTHWEST JUSTICE PROJECT AND NORTHWEST CONSUMER LAW CENTER

NORTHWEST CONSUMER LAW CENTER
Amanda N. Martin, WSBA #49581
936 N. 34th St. Ste. 300
Seattle, WA 98103
Ph: 206-805-0989
Email: amanda@nwclc.org

Counsel for Amicus Curiae,
Northwest Consumer Law Center

NORTHWEST JUSTICE PROJECT
Carrie Graf, WSBA #51999
Scott Crain, WSBA #37224
401 Second Ave S. Suite 407
Seattle, Washington 98104
Ph.: 206-707-0992
Email: carrie.graf@nwjustice.org
Email: scottc@nwjustice.org

Counsel for Amicus Curiae,
Northwest Justice Project

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I. STATEMENT OF INTEREST

Northwest Justice Project and Northwest Consumer Law Center respectfully submit this brief in support of the Petitioner/Cross-Respondent, Steven G. Long, urging the Court to uphold the Court of Appeals ruling on the applicability of the Homestead Act to vehicles occupied as a primary residence. Amici represent thousands of people every year who are concerned about the stability of their housing, face eviction, or find their property confiscated merely because they are homeless and have nowhere else to live. Amici submit this brief to outline authority confirming the homestead exemption automatically applies to protect individuals occupying their vehicle as a principal residence, and to provide its perspective on the scope of harms the impound process inflicts on vehicle sheltered individuals.

Northwest Consumer Law Center ("NWCLC") is a nonprofit law firm serving low and moderate income consumers throughout Washington State. NWCLC is the only organization in Washington that focuses solely on consumer legal issues. Since opening its doors in 2013, NWCLC has represented thousands of Washington consumers facing loss of their housing, including numerous vehicle-sheltered individuals seeking assistance to retain and protect their only residence. As such, NWCLC and

its clients have an interest in the development and fair application of Washington's homestead exemption laws.

II. INTRODUCTION

Mr. Long's homestead rights are rooted in the Washington State Constitution, the Homestead Act and the Revised Code of Washington (hereafter "RCW"). RCW 6.13. The Homestead Act "implements the policy that each citizen has a home where the family may be sheltered and live beyond the reach of financial misfortune." *Baker v. Baker,* 149 Wn.App. 208, 211, 202 P3d 983. (2009). The Court should affirm the lower court's conclusion that a vehicle used as a home is protected under the Homestead Act, that the Homestead Act applies in Mr. Long's case, and that withholding a vehicular home under threat of forced sale or violates the Homestead Act and the Washington Constitution. Wash. Const. art. 19, §1.

III. ARGUMENT

A. Vehicle-sheltered individuals face threats to their health and property on a regular basis because of the lack of protections for their homesteads

While the homelessness crisis in our state needs no introduction, the subgroup of unsheltered people using vehicles for their dwellings is at the heart of the issue before the Court. Affordable housing remains scarce and the number of homeless people living in vehicles is increasing across

Washington State. From 2017 to 2018, the number of individuals sleeping in their vehicles increased by 46 percent in King County. Zachary DeWolf et al., *All Home: Seattle/King County Point-in-Time-Count of Persons Experiencing Homelessness* (2019). From 2019 to 2020, this number increased again by 28 percent. *All Home: Seattle/King County Point-in-Time-Count of Persons Experiencing Homelessness* (2020). In Thurston County, 27 percent of homeless people surveyed for the 2020 point in time count lived in vehicles, an increase from 14 percent the year before. *Thurston County 2020 Point In Time Report*, p. 17. Yakima County's 2020 Point in Time Count indicated that 23 percent of unsheltered people slept in vehicles. *Yakima Point in Time Community Report* (2020), p. 13. The Washington State Department of Commerce, which aggregates Point in Time data of the 34 smallest Washington counties (excluding King, Pierce, Snohomish, Clark, and Spokane) reports that of the 2,592 unsheltered people counted in these counties' 2020 Point-in-Time, 515 (approximately 1/5) lived in vehicles. Washington State Department of Commerce, *Point In Time Balance of State Continuum of Care*, January 23, 2020 (data on file with author).

In NJP's experience working with vehicle-sheltered individuals, vehicles often represent a final attempt to avoid sleeping outdoors. An NJP attorney recently worked with an encampment of a dozen vehicle-

sheltered individuals facing impoundment, and nearly every resident expressed the same fear: if they lost their vehicle, they would be forced outside and would become sick or die due to exposure and lack of access to basic medical services. Like many of NJP's vehicle-sheltered clients, these individuals almost uniformly lived with disabilities or were senior citizens who cannot afford housing on fixed incomes. Thurston County's 2020 Point in Time suggests that many people sleeping in cars are women and children, because of the perceived safety relative to sleeping outdoors or in a shelter. *Thurston County 2020 Point In Time Report*, p. 18.

The vehicles in which people live are often in need of repair, and so may not be able to move in the timeline given by municipalities, making impoundment even more likely. Even if the vehicle runs and can be moved, the resident is then confronted with the problem of where to move and legally park their home. In addition to municipalities like Seattle enforcing existing parking ordinances against people living in vehicles, other cities are enacting parking ordinances as part of broader anti-homelessness schemes. For example, the city of Lacey in 2019 passed in quick succession an anti-camping ordinance, followed by a ban on RVs, trailers and campers parking longer than four hours within city limits. Lacey Ordinance 1449, 1551. NJP is currently participating in a lawsuit against Lacey challenging the constitutionality of the parking ordinance.

Long v. City of Lacey, 3:20-cv-05925-RJB, W.D. Wash. Vehicle-sheltered individuals in San Diego sued the city over its ordinances prohibiting RVs from overnight parking and prohibiting vehicle habitation. *Bloom v. City of San Diego, 3*:17-cv-02324-AJB-MSB, S.D. Cal.

B. The Homestead Act protects a person's residence from being withheld under threat of forced sale or lien attachment

The Homestead Act was enacted by the Washington State Legislature in order to comply with the State's constitutional mandate that "the legislature shall protect by law from forced sale a certain portion of the homestead and other property of all heads of families." Const. 1. art. 19,§1. The Homestead Act implements the policy that each citizen have a home where their family may be sheltered and live beyond the reach of financial misfortune. *Baker*, 149 Wn.App. at 211. "The right of homestead under our constitution and the statute enacted pursuant thereto is not a mere privilege or exemption of such an estate as the holder has in the land, but is an absolute right intended to secure and protect the homesteader and his dependents in the enjoyment of a domicile." *In re Poli's Estate*, 27 Wn.2d 670, 179 P.2d 704 (1947).

Homestead is simply "real or personal property that the owner uses as a residence." RCW 6.13.010. Generally, the Homestead Act "exempts [the homestead] from attachment and from execution or

forced sale for the debts of the owner up to the amount specified in RCW 6.13.080." RCW 6.13.070. Once this simple definitional requirement is satisfied, the real or personal property that the owner uses as a residence is protected from any forced sale to satisfy a judgment. RCW 6.13.040. Therefore, the "right to a homestead does not depend upon title, but upon occupancy and use." *Edgley v. Edgley*, 31 Wn.App. 795, 797, 644 P.2d 1208, 1210 (1982).

C. The Homestead exemption applies automatically to vehicles occupied as a primary residence

As soon as property is used or occupied as a principal residence, then the homestead exemption is automatic. *See* RCW 6.13.040(1) ("Once property is occupied as a principle residence, homestead protection is automatic."); *In re Dependency of Schermer*, 161 Wn.2d 927, 169 P.3d 452, 465 (2007) ("A home automatically becomes a homestead when the owners use the property as their primary residence."). Homestead is "real or personal property that the owner uses as a residence." RCW 6.13.010. Once property satisfies the simple definition of RCW 6.13.010 and is actually occupied by the owner as a principal residence, it is automatically protected as a homestead. RCW 6.13.040.

There are only three circumstances in which the homestead exemption is not automatic and the owner of real or personal property must take additional steps to claim the exemption. In order to determine when a declaration is required it is important to carefully examine RCW 6.13.040(1).

> Property described in RCW 6.13.010 constitutes a homestead and is *automatically protected by the exemption described in RCW 6.13.070 from and after the time the real or personal property is occupied as a principal residence by the owner* or, if the homestead is unimproved or improved land that *is not yet occupied as a homestead,* from and after the declaration or declarations required by the following subsections are filed for record or, if the homestead is a mobile home *not yet occupied as a homestead* and located on land not owned by the owner of the mobile home, from and after delivery of a declaration as prescribed in RCW 6.15.060(3)(c) or, if the homestead *is any other personal property,* from and after the delivery of a declaration as prescribed in RCW 6.15.060(3)(d).

RCW 6.13.040(1) *(emphasis added).* Thus, RCW 6.13.040(1) prescribes three categories of homestead exemptions where the owner must file a declaration. First, if the homestead is *improved or unimproved* land that is *not yet occupied* as a principal residence then the homestead exemption applies from the time the owner files a declaration pursuant to RCW 6.13.040(2). Second, if the homestead is a *mobile home, not yet occupied* as a principal residence and *located on land not owned by the mobile home owner,* then the homestead

exemption applies from the time the owner files a declaration pursuant to RCW 6.15.060(3)(c). Finally, if the homestead is *any other personal property* then the homestead exemption applies from the time the owner delivers a declaration pursuant to RCW 6.15.060(3)(d).

1. Under the plain language of the statute, the exemption applies automatically to vehicles occupied as a primary residence

When a statute's meaning is plain from the words used, the Court gives effect to this plain meaning as the expression of legislative intent. *Viewcrest Condo Ass'n v. Robertson*, 197 Wn. App. 334, 338 P.3d 1147, 1148 (2016). If the statute is ambiguous, courts consider rules of construction and legislative history. *Id.* In RCW 6.13.040(1), the legislature expressly outlined when any sort of declaration is required and when the homestead exemption applies automatically. The rule of construction *expressio unius est exclusio alterius* suggests that when the Legislature excluded the requirement for a declaration for real or personal property that is occupied as a principal residence it made clear that no declaration is required in Mr. Long's case. All three circumstances requiring the filing of a declaration to claim the homestead exemption apply only to property that is not yet occupied as a principal residence.

While the plain meaning of RCW 6.13.040(1) is apparent, the last category, "any other personal property", requires reference to another part of the statute. If an owner occupies "any other personal property" he/she must comply with RCW 6.15.060(3)(d). Any other personal property in RCW 6.13.040(1) refers to property not yet occupied as a primary residence. A plain reading of RCW 6.13.040(1) and 6.15.050(3)(d) makes it clear that a homestead exemption is still automatic and no declaration is required *if the personal property satisfies the definition of RCW 6.13.010* (actually occupied by owner as a principal residence). Therefore, the homestead exemption applies automatically to residents who are occupying their vehicle as a principal residence. Any other reading of the statute would render the first portion of RCW 6.13.040(1) meaningless and inconsistent with the remaining sections. "Property described in RCW 6.13.010 constitutes a homestead and is *automatically protected by the exemption described in RCW 6.13.070 from and after the time the real or personal property is occupied as a principal residence by the owner."*

2. Alternatively, the legislative history supports interpreting the statute as granting an automatic exemption to vehicle-sheltered individuals

Even if the statute were ambiguous, the legislative history supports this reading of the statute. Prior to 1981, anyone wishing to use

the homestead exemption had to file a declaration, regardless of whether the owner occupied the property as his/her primary residence. However, in 1981, the Legislature rewrote the homestead statute and established the automatic homestead exemption for properties that are occupied as principal residences. *Fed. Intermediate Credit Bank v. 0/S Sablefish*, 111 Wn.2d, 219, 229, 758 P.2d 494 (1988). The legislature was specific, definite and clear when it outlined what homestead exemptions are automatic. In 1993, when the legislature expanded the statue to include "personal property", the legislative history specifically states that the homestead exemptions scope was expanded because "some Washington citizens reside on their boats or in their cars or vans." Final Bill Report, SSB 5068 (1993); Senate Bill Report, SB 5068 (February 4, 1993); Senate Bill Report, SSB (5068) (March 13, 1993).

Additionally, the Legislature amended RCW 6.13.080 in 2018 and did not include vehicle liens, assessments or attachments to cover towing costs as one of the seven circumstances when a homestead exemption is not available.

3. The Homestead Act is construed liberally to protect the homesteader

Due to the fundamental interest protected by the Homestead Act, it has been construed liberally and given broad effect. *State ex rel. Van Doren v. Superior Court for King County,* 179 Wn. 241,243 37 P.2d 215

(1934) ("Homestead statutes are remedial measures, and should be liberally construed."); *In re Plants*, 7 F.2d 507, 508 (1925) ("Homestead laws are liberally construed"); *First National Bank of Everett v. Tiffany*, 40 Wn.2d 193,242 P.2d 169, 173 (1952). ("As a matter of public policy, homestead and exemption laws are to secure and protect the homesteader…They do not protect the rights of creditors."); *In re Poli*'s *Estate*, 27 Wn.2d at 674 ("We have consistently held that 'Homestead and exemption laws are favored in the law, and are to be liberally construed. '" (Quoting *State ex rel. White v. Douglas*, 6 Wn.2d 356, 107 P.2d 593, 594 (1940)). Through the enactment of RCW 6.13.070, the legislature reiterated its intent that the Homestead Act should be liberally construed. A liberal construction of the statute supports an automatic creation of homestead rights for vehicle-sheltered individuals.

4. Requiring vehicle-sheltered individuals to deliver a declaration creates ambiguity and confusion

The City's argument that Long needed to deliver a declaration also creates unnecessary ambiguity and confusion. While the City asserts that Long needed to follow the declaration requirements of RCW 6.15.060(d), this statute specifies that a declaration is to be delivered at "any time before sale" to the "officer making the levy." While the officer making the levy would likely be apparent in many debt contexts, it is not apparent in

an impound proceeding because the impound debt judgment is so automatic, the lien is automatic, and the forced sale is scheduled in a matter of weeks. Should the declaration have been delivered to the police officer who first authorized the tow, if Long can later locate that person? Should it have been delivered to the magistrate at his hearing? Or someone else? In the context of such an expedited and harsh process, it is even more paramount that any technical requirements, like declarations, be "specific, clear, and definite." *Viewcrest Condominium Associations v. Roberta*, 197 Wn. App. 334, 337, 387 P.3d 1147, 1148 ("…any limitation on a right of homestead must be specific, clear, and definite.") Imposition of such requirements otherwise serves to deprive someone of their rights entirely. Further, since declarations can be done at *any time before sale*,[1] they do not serve any real notice purpose in the case of impounds. Here, Long had already satisfied most of the declaration's substantive requirements at his hearing. He told the magistrate that the property was his home, and the magistrate knew on the record, by the very nature of the impound proceeding, that Long was the owner and what property was at issue. CP 490, 495. The only remaining requirement under RCW

[1] Even in real property situations, the existence of declarations has often done little to provide any sort of notice to creditors, and complex issues of homesteads in real property have existed as well. *See, e.g., Clark v. Davis*, 37 Wn.2d 850 at 856–57 (deciding how a homeowner could have in good faith filed a declaration of homestead when her property had been ordered sold in a partition suit she had instituted.)

6.15.060(d), an estimate of the home's value, could have been resolved by a simple one question colloquy from the magistrate.[2] CP 490. In effect, Long did attempt to assert his homestead rights at the only forum available to him, and he was rebuffed. Mr. Long's case is representative of the vast majority, if not entirety, of vehicle-sheltered individuals with whom NJP works in that the value of their vehicles is less (often far less) than the $15,000 homestead amount.

D. Homestead protections cannot be ignored by forcing a vehicle-sheltered resident into a payment plan

The contention that a creditor can withhold and threaten to sell exempt property and force someone into a payment plan to get their property back undermines the homestead exemption's very purpose of protecting someone's ability to remain housed in the face of creditor claims. *Baker*, 149 Wn.App. at 211. Allowing a court or creditor to force an impoverished person to enter into an unaffordable payment plan prior to return of their home undermines the entire concept of homestead, which is that such property should be "free from the claims of creditors." *City of Algona v. Sharp*, 30 Wn. App. 837, 843, 638 P.2d 627, 630 (1982).

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[2] This requirement is likely there to determine if the value of a homestead is under the exemption. Long's home was entirely exempt as a homestead because it was below the statutory homestead amount of $15,000 under RCW 6.13.030. However, even if his home was over $15,000, extra process would have been required for his home to be sold. RCW 6.13.150. Therefore, regardless of his answer to this question, extra steps would have had to be taken to sell a home, and the magistrate erred by not considering this information.

Washington courts have found it a homestead violation to force a homesteader to make repayment arrangements under threat of forced sale in order to live in their home while it is pending a foreclosure sale. In *Sharp*, the court quashed a notice of foreclosure sale, even though the homesteader would have had a two-year redemption period in which to live in the home and pay back the underlying assessments. *Id. See also Pinebrook Homeowner's Association v. Owen*, 48 Wn.App. 424, 431, 739 P.2d 110, 115 (1987) (Holding that a homestead was exempt from a judgment which, if unpaid, subjected the homesteader to a foreclosure sale.) It follows that it must also be a homestead violation to seize a vehicular home via impound and refuse to release the home unless the homesteader enters into a payment plan.

This Court considered an analogous situation in *Wakefield v. City of Richland*, 186 Wn.2d 596, 608, 380 P.3d 459, 465 (2016). There, this Court held that indigent individuals could not be made to use protected public benefits, like Supplemental Security Income (SSI), to pay back legal financial obligations (LFOs). This Court also noted that, given the reality that an impoverished person may end up paying more than they originally owed due to the length of the repayment schedule, "trial courts should be cautious" about imposing long-term payment plans. *Id.* The same underlying logic exists here for disallowing requirement of a

payment plans in exchange for the return of a legally-protected asset. Further, as a practical matter, many vehicle-sheltered individuals rely on SSI or other public benefits, and so *Wakefield* would protect them from payment plans that drew from this protected income.

E. Automatic homestead protections are critical in the context of the expedited impound debt collection process

1. The impound process is fast and provides little due process protection

An automatic homestead exemption represents one of the only protections against swift loss of a vehicle relied upon as a home. NJP annually represents thousands of Washingtonians facing homelessness, whether through foreclosure, eviction, ejectment, or impoundment and auction of a vehicle in which they live. Of all these processes, impoundment is the most expedited, providing as little as twenty-four days from the date of seizure to auction. RCW 46.55.110-130. Procedurally, it provides little in the way of due process protections, far less than even the summary eviction process. Unlike foreclosure, eviction or ejectment, which all require a pre-deprivation hearing and a summons that clearly directs a person to legal assistance, a person whose vehicle has been impounded is only provided a hearing if they request one within ten days of receiving the towing notice. RCW 46.55.110; *see also* RCW 59.18.365. There is a high likelihood that vehicle-sheltered individuals will not even

receive the notice, since it is mailed to the registered owner's physical address, at which the homeless individual likely does not reside. RCW 46.55.110(a). Finally, the notice says nothing about homestead rights.

In this context, where a person's home can be auctioned off before an opportunity to object, automatic homestead protections assume critical importance. An automatic homestead protection, if recognized by a parking enforcement officer who sees indications a vehicle is lived in (as in Mr. Long's case, it is often evident when someone lives in a vehicle), may be the only meaningful protection of a vehicle-sheltered individuals' home prior to impound and auction.

2. Washington courts have extended homestead protections to residents facing far less harsh debt collection processes than impoundment

Extending automatic homestead protections to vehicle-sheltered individuals makes sense when considering how broadly Washington courts have applied this protection. Impound is a far harsher debt collection process than any other debt collection process our courts have faced in looking at the application of homestead. Compare impound with the situation considered in *City of Algona v. Sharp*. 30 Wn.App. 837, 638 P.2d 627 (1982). There, the court found homestead protections applied to a homeowner who faced foreclosure after failing to pay an $800 assessment over a twenty year period. Even though the homeowner still

had a two year redemption period, during which time he could reside in his home, the court found that these alternatives did not "fulfill the clear intent of homestead protection, that a debtor retain ownership of a certain portion of his property, free from the claims of creditors." *Id.* at 843. *See also First National Bank of Everett v. Tiffany*, 40 Wn.2d 193, 202, 242 P.2d 169, 174 (1952) (homesteader retains a right to possession during redemption period regardless of whether mortgage represents a portion of a purchase price). In *Clark v. Davis*, the court found that a homestead declaration was still valid even though the homeowner herself had instituted the sale she was trying to stop with the declaration. 37 Wn. App.2d 850, 226 P.2d 904 (1951). In *Viewcrest*, the court held that a broad construal of homestead rights meant a condominium owner retained possession, without obligation to pay rent, during a redemption period, despite apparent limitations by other statutes. *Viewcrest,* 197 Wn.App. at 345. *See also, Pinebrook Homeowners Ass'n v. Owen*, 48 Wn.App. 424, 430-31, 739 P.2d 110, 115 (1987) (rejecting the argument that the foreclosure of a homeowner's association assessment lien, agreed to by the owner, did not fall under homestead protection, at the time those types of liens were not statutorily excluded from homestead protection).

F. Municipalities can simultaneously protect homestead rights of people living in vehicles and regulate parking

1. Homestead laws do not deprive cities of the ability to enforce parking laws

The City of Seattle argues, that if automatic homestead protections are applied to vehicle-sheltered individuals, the City's ability to enforce parking regulations will be so severely impacted as to result in the "co-opting" of public property. This ignores the fact that the City can continue to enforce parking regulations against people who do not live in their cars, and can in fact even continue to regulate parking of vehicle-sheltered individuals. The only thing that the City may not do is regulate parking by depriving Mr. Long, and the limited number of other vehicle-sheltered individuals parked along public streets, of his only home. The homestead right means that someone who lives in their vehicle should be able to get it back right away without having to pay or arrange to pay and should lower daily storage fees that only accrue while a homestead is unlawfully withheld. Homestead law is a simple application in protection of debtors and homes, in derogation of creditor rights.

2. Municipalities have many alternatives to impoundment and auction

Cities have many alternatives to impounding homestead vehicles under threat of payment plan or auction. For example, they could require that vehicle-sheltered residents park in safe parking lots, as designated by

the city. They could release vehicles immediately if the occupant claims that it is their home and require a hearing later. They could offer expedited hearings to people claiming homestead rights. They could train parking enforcement officers to identify signs that a vehicle is lived in so that the vehicle is treated differently than other vehicles in violation of parking regulations. They could tow vehicles with presumed homestead protections to a city lot, and not require payment upon release. While this could result in cities incurring tow costs, these are costs that might alternatively be incurred providing homelessness services if the person lost their vehicle to auction. It is also not likely cities will recover impound costs quickly, if at all, from people who are so indigent that they have to rely on vehicles for shelter. There is evidence that these alternatives are practical. The Municipal Research and Services Center informally surveyed cities about their response to the Court of Appeals decision, and found that Washington state municipalities are already adopting some of these changes. Oskar Rey, *Living in Vehicles: How Homestead Rights Affect Municipal Impounds*, Municipal Research and Services Center (Aug. 17, 2020), http://mrsc.org/Home/Stay-Informed/MRSC-Insight/August-2020-1/Living-in-Vehicles-Homestead-Rights.aspx.

IV. CONCLUSION

For the forgoing reasons, the Court should affirm the Court of Appeals and find that the Homestead Act applies to Mr. Long's vehicle. Further, the Court should conclude that no declaration of homestead is required for vehicle-sheltered individuals and provide guidance to the municipalities enforcing parking restrictions that vehicle-sheltered individuals are entitled to the same protections as homeowners living in stick-built homes.

RESPECTFULLY SUBMITTED this 5th day of February, 2021.

/s/ Carrie Graf
Carrie Graf, WSBA #51999
Scott Crain, WSBA #37224
Northwest Justice Project
401 Second Ave. S, Suite 407
Seattle, WA 98104
Ph.: 206-707-0992
Email carrie.graf@nwjustice.org
Email scottc@nwjustice.org
Counsel for Amicus,
Northwest Justice Project

/s/ Amanda N. Martin
Amanda N. Martin, WSBA #49581
Northwest Consumer Law Center
936 N. 34th St. Ste. 300
Seattle, WA 98103
Ph: 206-805-0989
Email amanda@nwclc.org
Counsel for Amicus,
Northwest Consumer Law Center

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- sarah@ahmlawyers.com
- scottc@nwjustice.org
- talner@aclu-wa.org
- tbauman@nlchp.org
- todd@ahmlawyers.com

- tweaver@tomweaverlaw.com
- wmaurer@ij.org

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Sender Name: JoAnn Ortiz - Email: joanno@nwjustice.org
Filing on Behalf of: Carrie Suzanne Graf - Email: carrie.graf@nwjustice.org (Alternate Email:)

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Phone: (206) 707-0905

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