No. 26-6062 ORIGINAL

Supreme Court, U.S.
FILED
FEB - 3 2026
OFFICE OF THE CLERK

In The Supreme Court of the United States

Sara Hutchinson,

Petitioner

v.

Ed Putka,

Respondent

On Petition for a Writ of Certiorari to the Supreme Court of Washington

PETITION FOR A WRIT OF CERTIORARI

Sara Hutchinson, Pro Se
PO Box 773
Kalama, WA 98625
Kiebler022@gmail.com
(360) 749-7249

Questions Presented

1. State Fair Housing Protection: Whether Washington courts erred in failing to interpret RCW 49.60.2235 – Washington's fair housing anti-coercion statute – consistently with its federal analogue, 42 U.S.C. § 3617, thereby undermining important housing rights and protections against coercion and retaliation for protected individuals (specifically disabled veterans and vulnerable persons) in real estate transactions.
2. Procedural Due Process: Whether the trial and appellate courts violated Petitioner's right to procedural due process by excluding or disregarding material evidence and by reversing the trial court's initial summary judgment ruling (which had allowed Petitioner's discrimination claim to proceed) without any material change in circumstances – effectively depriving Petitioner of a fair opportunity to present her case to a jury.
3. Equal Protection: Whether the decisions below deny Petitioner the equal protection of the laws guaranteed by the Fourteenth Amendment, where Petitioner – as an honorably discharged veteran with mental health disabilities – was deprived of the protections of state anti-discrimination law intended for her benefit, and whether the lower courts' handling of her claims failed to afford the careful consideration warranted for members of these protected classes.

Parties to the Proceeding

Petitioner **Sara Hutchinson** is an individual (a disabled military veteran) who appeared pro se in the proceedings below. Respondent **Ed Putka** is an individual who was the defendant in the trial court and the respondent on appeal. No parties are corporations, and no entity other than the named parties has any ownership or interest to disclose.

Table of Contents

- **Questions Presented** 2
- **Parties to the Proceeding** 3
- **Table of Contents** 3
- **Table of Authorities** 4
- **Opinions Below** 5
- **Jurisdiction** 6
- **Constitutional and Statutory Provisions Involved** 6
- **Statement of the Case** 7
- **Factual Background** 7
- **Procedural History** 14
- **Reasons for Granting the Petition** 16

  I. *Washington's Failure to Align RCW 49.60.2235 with 42 U.S.C. § 3617* ... 17

  II. *Procedural Due Process Violations in the Courts Below* 22

  III. *Denial of Equal Protection to a Disabled Veteran* 27
- **Conclusion** 32
- **Appendix** i

  A- Washington Court of Appeals, Div. II, Unpublished Op. No. 58844-7-II (Apr. 29, 2025)..... ii

  B- Superior Court Order Granting Second Motion for Summary Judgement....xxii

C- Washington Supreme Court Order, No.104232-9 (Nov. 5, 2025)..... xxiv

D- Superior Court VBR ruling (in part) for first Summary Judgement...

E- Superior Court Order Denying Summary Judgement.....

F- Superior court Order denying Motion to Reconsider...

G- Superior Court VBR ruling for Motion in limine...

H- Petitioner's Declaration ...

Table of Authorities

Cases

Anderson v. Liberty Lobby, Inc., 477 U.S. 242 (1986) 21

Mikkelsen v. Pub. Util. Dist. No. 1, 189 Wn.2d 516, 404 P.3d 464 (2017) 18, 19, 22

McDonnell Douglas Corp. v. Green, 411 U.S. 792 (1973) 23

Reeves v. Sanderson Plumbing Prods., Inc., 530 U.S. 133 (2000) 21, 22, 26, 29, 30, 31

Scrivener v. Clark College, 181 Wn.2d 439, 334 P.3d 541 (2014) 18, 19, 20, 22, 29, 30

Statutes and Rules

42 U.S.C. § 3617 (Fair Housing Act § 818) 2, 6, 16, 17, 18. 20, 21,22, 31, 33

28 U.S.C. § 1257(a) 5, 30

RCW 49.60.030(1)(c) (WLAD general anti-discrimination provision) ..... 6, 14, 28, 29 , 30

RCW 49.60.2235 (WLAD anti-coercion in real estate) 2, 6, 14, 17, 18, 19, 21, 22, 31

U.S. Const. amend. XIV, § 1) ..... 5, 16, 22, 23, 24, 25, 26, 29 , 30
(Equal Protection & Due Process Clauses

Supreme Court Rule 10..... 16

Supreme Court Rule 13 5

Supreme Court Rule 14 ..... (cited in caption)

Other Authorities

Washington Court of Appeals, Div. II, Unpublished Op.

No. 58844-7-II (Apr. 29, 2025) 8, 15

Washington Supreme Court Order, No. 104232-9 (Nov. 5, 2025) 6

Opinions Below

The unpublished opinion of the Washington Court of Appeals, Division II (Case No. 58844-7-II, filed April 29, 2025) is included in the Appendix (App. A at 32-52) . In that decision, the Court of Appeals affirmed the trial court's second motion for summary judgment in favor of Respondent, dismissing Petitioner's Washington Law Against Discrimination ("WLAD") claim. The Cowlitz County Superior Court's orders are also in the Appendix: the trial court's initial oral ruling denying summary judgment in part (Dec 2022) it's written order ruling denying summary judgment and its subsequent written order granting summary judgment and dismissing Petitioner's remaining claim (Sep 2023) (App. B). The Supreme Court of Washington's order denying review (entered November 5, 2025) is included at App. C. And the Petitioners declaration from the first summary judgment Dec 2022.

Jurisdiction

The Washington Supreme Court denied Petitioner's motion for discretionary review on November 5, 2025 (Supreme Court of Washington No. 104232-9) . This petition is being filed within 90 days of that date, making it timely under Supreme Court Rule 13. Petitioner invokes this Court's jurisdiction under 28 U.S.C. § 1257(a). The decision of the Washington courts below presents federal questions under the U.S. Constitution (due process and equal protection rights) and involves the interpretation and application of a state statute in a manner that implicates the scope of federal fair housing protections. Accordingly, this Court has jurisdiction to review the judgment of the state court of last resort in this matter.

Constitutional and Statutory Provisions Involved

U.S. Constitution, Amendment XIV, § 1 (in pertinent part):

"No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws."

42 U.S.C. § 3617 (Fair Housing Act – Interference, coercion, or intimidation):

"It shall be unlawful to coerce, intimidate, threaten, or interfere with any person in the exercise or enjoyment of, or on account of his having exercised or enjoyed... any right granted or protected by [the fair housing provisions of 42 U.S.C. §§ 3603–3606]."

RCW 49.60.2235 (Washington Law Against Discrimination – Unfair practice to coerce, intimidate, threaten, or interfere regarding real estate transaction rights):

"It is an unlawful practice to coerce, intimidate, threaten, or interfere with any person in the exercise or enjoyment of, or on account of his or her having exercised or enjoyed, or on account of his or her having aided or encouraged any other person in the exercise or enjoyment of, rights regarding real estate transactions secured by RCW 49.60.030, 49.60.040, and 49.60.222 through 49.60.224."

RCW 49.60.030(1)(c) (WLAD – Declaration of civil right):

This provision guarantees the right to be free from discrimination because of "honorably discharged veteran or military status" and "the presence of any sensory, mental, or physical disability" in the context of real estate transactions . (All pertinent provisions are reproduced in full in the Appendix.)

Statement of the Case

Factual Background

Petitioner Sara Hutchinson is a disabled U.S. military veteran who suffers from post-traumatic stress disorder (PTSD), depression, and anxiety (Div. II Unpublished Op. at 1.) whom also receives veterans benefits. In 2019, Ms. Hutchinson began leasing a commercial space from Respondent Ed Putka to operate a small massage therapy business.(Div. II Unpublished Op. at 1) Unbeknownst to Mr. Putka at the time, Ms. Hutchinson's professional massage therapy license had lapsed, and she was practicing without a current license – a fact that would later become a point of contention. (Div. II Unpublished Op. at 1.) Shortly after she moved into the commercial space, Ms. Hutchinson placed a "Veterans of Foreign Wars" (VFW) sign in the window to express her support. Mr. Putka promptly called and asked her to remove or relocate the VFW sign, claiming it violated building rules against unapproved signage.(Div. II Unpublished Op. at 2.) Ms. Hutchinson was surprised, and at a later date recognized she had displayed other signs without issue, and Mr. Putka's objection appeared to single out the VFW sign – which he allegedly compared to a prohibited political sign.(Putka's deposition CP at 436) Aside from this incident (which Petitioner perceived as indicative of Mr. Putka's attitude towards veterans affiliation), the parties had minimal business and no personal interactions for the next two years. (Div. II Unpublished Op. at 3.)

In May-2021, Mr. Putka and his wife decided to sell their personal residence in Kalama, Washington – a historically recognized house located adjacent to a new home they had built and were moving into. (Div. II Unpublished Op. at 2,) Ms. Hutchinson, eager to become a homeowner, expressed interest in buying Mr. Putka's house calling him on the day it was listed

when he insisted on the dealings be done between realtors. (Hutchinson's Deposition CP at 453) On May 15, 2021, the parties signed a binding Purchase and Sale Agreement for the property, with Ms. Hutchinson offering full asking price.(Div. II, Unpublished Op Pg. 3) It is undisputed that Mr. Putka knew Ms. Hutchinson was the buyer from the outset. The transaction documents indicated that Ms. Hutchinson planned to utilize a U.S. Department of Veterans Affairs (VA) home loan to finance the purchase. She also wrote a letter to Mr. Putka disclosing that she was a disabled veteran, thanking him for the opportunity to purchase the home. (Div. II Unpublished Op. at 3.) At that point, Mr. Putka later claimed, he assumed her military-related disability was physical in nature and "had no idea it may have been psychological". (Putka's Declaration CP at 396). In the weeks following the contract signing, Mr. Putka appeared supportive of the sale: he performed approximately \$10,000 in repairs to the house in agreement (Div. II, Unpublished Op Pg. 3) for Ms. Hutchinson to extend the closing date two weeks out (Hutchinsons deposition CP at 458), offered Ms. Hutchinson some of the home's furnishings (an upright piano and patio furniture), and made sure the necessary easements were finalized that were put in for records prior to listing of the home. By all outward indications, the sale was on track and amicable.

However, in early July 2021 – shortly before the scheduled closing date of July 15 – the situation took a drastic turn. On July 8, 2021, Mr. Putka summoned Ms. Hutchinson to a meeting at the commercial building. At this meeting, Mr. Putka confronted Ms. Hutchinson with the fact that her massage therapist license had expired. (Div. II, Unpublished Op Pg. 4) Ms. Hutchinson initially did not deflect and said that it was true. When Mr. Putka asked her if she had turned in paperwork for her license renewal, she was dishonest and said she had, but under Mr. Putka's questioning she admitted that was untrue. Mr. Putka insisted that Ms. Hutchinson cease

performing massages on his property until her license was reinstated, and Ms. Hutchinson agreed to do so. Mr. Putka then remarked that Ms. Hutchinson should "call [her] realtor" because her "employment [had] changed" and he believed she would no longer qualify for her financing. In response Ms. Hutchinson asked if she could call her lender, she did not want to notify her realtor (who was also a client of her business) immediately until she figured out how to tell her clients that she had to stop her practice. (Hutchinson's Declaration CP at 117) That same day, Mr. Putka also noted he could not find a valid state business license for Ms. Hutchinson's practice. Upon checking, Ms. Hutchinson realized her general business license had also expired on June 30th (just a week prior); she immediately renewed it and sent proof of renewal to Mr. Putka. (Hutchinson's Declaration CP at 117) The next day, July 9, 2021, Ms. Hutchinson met with Mr. Putka to apologize for her dishonesty of turning in paperwork. During this conversation, Mr. Putka asked Ms. Hutchinson why she hadn't taken care of her license, in explaining why she had struggled with administrative tasks like license renewal, Ms. Hutchinson disclosed for the first time the specifics of her disabilities – namely, that she suffers from depression, anxiety, and PTSD, which sometimes impede her ability to "take care of things". (Hutchinson's Declaration CP at 118) This revelation marked the moment when Mr. Putka became fully aware of the nature of Ms. Hutchinson's mental health conditions. Ms. Hutchinson alleges that Mr. Putka's demeanor changed upon learning of her psychiatric disabilities. According to Ms. Hutchinson, Mr. Putka asked pointedly how he and his wife were "supposed to feel" about having her as their neighbor, (Div. II Unpublished Op. at 4.) and inquired "what will you say when the papers call you?" – referring to her concurrent candidacy for local city council (she responded with she hoped they wouldn't find out and Mr. Putka laughed at her saying it

was a small town)(Hutchinson's Declaration CP at 118) and accusing her of being criminally negligent. These comments later struck Ms. Hutchinson as veiled derogatory references to her mental health status and public reputation. Mr. Putka then interrogated Ms. Hutchinson about her personal finances and homeownership readiness: he asked whether she currently paid rent (to which she answered that she rented from her parents, prompting Mr. Putka to laugh at her) and quizzed her on her income and whether she had made a down payment on the house. (Hutchinson's Declaration CP at 119) When Ms. Hutchinson explained that, as a VA borrower, she was not required to make a down payment, Mr. Putka shook his head and remarked, "You know why lenders like using VA loans? ... You didn't even have to do a down payment". This comment suggested a disparaging view of the VA loan benefit, implying that Ms. Hutchinson was obtaining the home too easily and causing Ms. Hutchinson to timidly say that she's thankful for the benefits she has. During his questioning of her finances he learned of her VA compensation benefits and the amount she receives and Mr. Putka stood up very angry saying he put $10,000 into the house repairs for her that her lender required him to, but to clarify the repairs were requested by the realtor and were not requirements like Mr. Putka believed they were. (Hutchinson's Declaration CP at 119) By the end of the July 9 conversation, Mr. Putka stated that he "accepted [her] apology and he wasn't making any promises" regarding the commercial space use, and the meeting ended without overt action.

The following day, July 10, 2021, Mr. Putka asked Ms. Hutchinson to meet yet again. In this meeting, Mr. Putka abruptly informed Ms. Hutchinson that he and his wife no longer wished to sell their house to her. .(Div. II Unpublished Op. at 5.) Startled, Ms. Hutchinson asked for an explanation. Mr. Putka stated, quite bluntly: "Honestly, Sara, we don't trust you and we

don't want to be neighbors with you." He then delivered an ultimatum. Mr. Putka told Ms. Hutchinson that if she agreed to back out of the home purchase, he would be "willing to work with [her] to stay in the commercial building" (i.e. not evict her from her business rental). By clear implication, if she refused to rescind the house sale, she would face eviction from her business premises.

Ms. Hutchinson also recalls Mr. Putka saying he would refrain from disparaging her publicly if she forfeited the home purchase – an indication that, should she proceed with buying the house, he might "speak negatively" about her in the community or to the press (a particularly concerning threat given her political campaign). Caught off guard, Ms. Hutchinson pleaded for a couple of days to consider this dramatic request. Mr. Putka pressed for an immediate answer, saying "it's an easy answer, you either have a place to work or you don't," though he ultimately relented by the end of the meeting and gave her until 1:00 that day to respond. (Hutchinson's Declaration CP at 120)

In the hours that followed, Mr. Putka began acting to reinforce his threats. Almost immediately after the July 10 meeting, Mr. Putka solicited a backup buyer for the house. He received a backup purchase offer from another party, the details of which (including whether that potential buyer was using a VA loan or had a military background) (Div. II Unpublished Op. at 5.) in court remained unclear due to incomplete documentation produced in discovery. At the same time, Ms. Hutchinson consulted her realtor. Her realtor informed her that Mr. Putka had no lawful basis to force her out of the purchase agreement, since it was a binding contract, and told her she may have to get an attorney. Armed with this knowledge, Ms. Hutchinson texted Mr. Putka on the afternoon of July 10, stating that she would need to speak with a lawyer

before making any decisions. Mr. Putka's response was swift and punitive: he notified Ms. Hutchinson that he had mailed her a notice of default on her commercial lease – the first step toward eviction. In a series of text messages, Mr. Putka made clear that the notice was leverage in what he called a "global deal" linking the two matters (the house sale and the commercial tenancy). He wrote:

"I remain open to working out a global deal involving both the house and you staying in the building. The notice I sent is to protect my interests in case we can't work it out. You have already broken the lease... We have plenty of grounds to legally evict you now, but are still willing to discuss settling this in a way for you to remain in the building."

In other words, Mr. Putka explicitly conditioned Ms. Hutchinson's ability to keep her business lease on her agreeing to give up the house purchase. Mr. Putka also reiterated the coercive confluence of the two issues in a conversation with Ms. Hutchinson's attorney, stating that he viewed "the house and [the] commercial space" as "connected" and part of "one deal". (Div. II Unpublished Op. at 6.)

Over the next few days (July 11–13, 2021), Mr. Putka continued to pressure Ms. Hutchinson via messages, demanding to know her decision. On the 13th, Ms. Hutchinson informed Mr. Putka that she was taking steps to remedy the license situation (her professional license renewal was being expedited by the state) but that she would not negotiate about the home sale directly with him any further – any such discussions should occur through the realtors as per the purchase agreement. (Hutchinson's Declaration CP at 123) Frustrated by Ms. Hutchinson's resistance, Mr. Putka escalated his threats. In one exchange, via a phone call, on July 13, 2021, Ms. Hutchinson accused Mr. Putka of "holding something over [her] head to get [her] to do something else" – namely, using the threat of eviction to force her to relinquish the house. Mr. Putka flatly denied that characterization ("No, no, no") even as he reinforced it,

stating: "I feel that the house and commercial space are ... one deal." He then ominously added: "You know the state can take comments – how would they feel finding out that you've been practicing for so long without a license?". This remark was a clear threat to report Ms. Hutchinson to the Washington Department of Health (DOH)– a report that could jeopardize her career and even expose her to fines or criminal penalties. At this point, Ms. Hutchinson was under extreme duress. Indeed, the stress of these events caused a deterioration in her mental health: after this last phone interaction she required hospital treatment (Hutchinson's Declaration CP at 124) for acute anxiety triggered and mental health break by the compounded pressures of the multiple threats and facing Mr. Putka's intimidation. Despite Mr. Putka's coercive campaign, Ms. Hutchinson ultimately resolved not to surrender her contractual right to purchase the home. The sale closed on July 15, 2021 as scheduled, and Ms. Hutchinson took possession of the house. (Div. II Unpublished Op. at 6.)

In retaliation, immediately after the closing, Mr. Putka followed through on his threats. He served Ms. Hutchinson with a formal notice of eviction from the commercial building, (Div. II Unpublished Op. at 6.) forcing her to relocate her business on short notice. He also contacted a local news publication and informed a reporter that Ms. Hutchinson had been operating as a massage therapist with an expired license, thereby publicly shaming her and potentially harming her reputation (particularly damaging given her public role as a council candidate). Mr. Putka did not stop there: he lodged an official complaint against Ms. Hutchinson with the Washington State Department of Health for practicing with an expired license, triggering a regulatory investigation. He additionally filed a small claims lawsuit against Ms. Hutchinson seeking to retain her security deposit from the commercial lease. Petitioner also alleges that Mr.

Putka spread negative statements about her to various members of the community, though Mr. Putka insists he was merely engaging in his pattern of "publicly challeng[ing]" political candidates (in this case, Ms. Hutchinson) as he had done in the past.

In sum, within days of learning the intimate details of Ms. Hutchinson's disabilities and her VA compensation and use of veteran benefits, Mr. Putka engaged in a relentless series of threats and actions: attempting to coerce Ms. Hutchinson into rescinding a valid home purchase, threatening her livelihood and reputation, and ultimately evicting her and publicly humiliating her – all in direct response to her refusal to abandon the home purchase. Ms. Hutchinson was thus able to purchase the home she contracted for, but, in her view, at a severe cost: the experience left her traumatized, removing her business location, and under public scrutiny – a classic example of a person exercising a housing right "under extreme duress".

Procedural History

In December 2021, Petitioner Sara Hutchinson filed a civil action against Respondent Putka in Cowitz County Superior Court arising from the Respondent's alleged attempts to coerce her to abandon the purchase of a residence. The complaint asserted multiple causes of action, including claims under the Washington Law Against Discrimination (WLAD), chapter 49.60 RCW. Relevant her, Petitioner alleged violations of RCW 49.60.030 and RCW 49.60.2235, asserting that Respondent interfered with her right to purchase housing because of her protected status as a disabled veteran.

Respondent moved for summary judgment. In December 2022, the trial court granted summary judgment on all claims except the WLAD claim. VRP at 38. In opposing summary judgment on that claim, Petitioner relied on burden-shifting discrimination framework case law

to argue that discriminatory motive presented a triable issue of fact. The trial court denied summary judgment on the WLAD claim, concluding that questions concerning Respondent's motivation were for the trier of fact.

[W]e have action that was taken that was negative to [Hutchinson] in the form of her lease, in the form of complaints to the State. And what motivated that action,whether it was a good faith action to evict someone for having an unlawful business in a building; or, if that was motivated because of the status of the mental disability . . . that would seem to be more of a question for . . . a trier of fact Verbatim Rep. of Proc (VRP) at 38 (Div. II, Unpublished Op Pg. 7)

After additional discovery, Respondent renewed his motion for summary judgment on the remaining WLAD claim. On August 25, 2023, the trial court granted the renewed motion, applying a burden-shifting analysis and concluding that Respondent articulated a legitimate, non-discriminatory reason for his conduct and the Petitioner failed to raise a genuine issue of material fact that discrimination was a substantial motivating factor.

The trial court denied Petitioner's motion for reconsideration, and Petitioner appealed. ON April 29, 2025, the Washington Court of Appeals, Division II, affirmed in an unpublished opinion. The court applied a burden-shifting analysis, concluded that Petitioner had made an initial showing sufficient to raise an inference of discriminatory intent, but held that she failed to establish pretext or discriminatory motive sufficient to survive summary judgment. Hutchinson v. Putka, No. 58844-7-II, slip op. (Wash. Ct. App. Apr. 29, 2025) (unpublished).

Prior to the renewed motion for summary judgment, the court ruled on a motion in limine limiting the admissibility of post-closing conduct, permitting such evidence only if linked to Respondent's pre-closing intent.

"Lawful action and behavior can also be discriminatory, based on the intent and the state of mind of individual taking that. So, a threat -- I guess, you know, extortion does not mean that you are improperly -- that you don't have the right to do something. It's the purpose that you're doing it for is what makes it extortion. VRP at 58

"...as far as any actions that occurred post-July 15th, the Court will issue an order that those should not be brought up. They will be not admissible, unless -- and when I say, "unless," what that means is... if you're going to go into a question to witness or seek to introduce any evidence that would be post-July 15th, you're going to have to ask for a recess and have that put in front of the Court and show how that would establish any link to the state of mind of the Defendant pre sale of the home..." VRP at 57

Ms. Hutchinson sought discretionary review in the Washington Supreme Court, raining, inter alia, the federal constitutional issues presented here. On November 5, 2025, the Washington Supreme Court denied review, with no justice dissenting, thereby rendering the decision of the Washington Court of Appeals final. Wash. Sup. Ct. Order Denying Review, No. 104232-9 (Nov. 5, 2025). The denial of review left intact a decision resolving a civil-rights claim under a statute of first impression without articulated governing standards. The petition for a writ of certiorari timely follows.

Reasons for Granting the Petition **(Statement of Rule 10 Considerations)**

This case presents important and recurring issues at the intersection of state anti-discrimination law, federal fair housing principles, and constitutional guarantees of due process and equal protection. (U.S. Const. amend. XIV, § 1; 42 U.S.C. § 3617; RCW 49.60.2235.) Petitioner is a disabled veteran who alleges that she was threatened, intimidated, and retaliated against for attempting to exercise her right to purchase a home. (Div. II Unpublished Op. at 1–6; Hutchinson Decl., CP at 117–124.) Although she ultimately completed the purchase, she was punished for doing so in a manner that chills the very housing rights that fair housing laws are designed to protect. (Div. II Unpublished Op. at 6; 42 U.S.C. § 3617; RCW 49.60.2235.)

At the center of this case is RCW 49.60.2235, Washington's fair housing anti-coercion statute, which makes it unlawful to "coerce, intimidate, threaten, or interfere" with a person's exercise of housing rights because of protected characteristics. (RCW 49.60.2235.) To Petitioner's

knowledge, no Washington appellate court has issued a published decision interpreting the scope of this provision. (See generally RCW 49.60.2235; App. A.) The statute was modeled after the federal Fair Housing Act's anti-interference provision, 42 U.S.C. § 3617, and employs materially similar language intended to secure the same fundamental protections. (42 U.S.C. § 3617; RCW 49.60.2235.)

The absence of state precedent creates a serious gap. Victims of housing-related retaliation and intimidation lack a clear standard for relief, while housing providers and sellers lack notice of the statute's reach. Although the Court of Appeals cited no Washington authority interpreting RCW 49.60.2235, it resolved Petitioner's claim without articulating a governing legal standard and without explaining how the statute should be applied in practice. That silence is consequential.

Federal courts have consistently interpreted 42 U.S.C. § 3617 broadly to effectuate the Fair Housing Act's remedial purposes. (42 U.S.C. § 3617.) Threatening or coercive conduct intended to deter a person from exercising housing rights is unlawful even if the threats do not succeed. The focus of the statute is the attempt to interfere with protected housing rights, not whether the victim ultimately capitulates.

Here, Respondent's conduct—conditioning Petitioner's continued tenancy and professional livelihood on her abandonment of a home purchase, while threatening reputational and legal harm if she proceeded – falls squarely within the type of conduct that fair housing anti-coercion laws are designed to prohibit. (Div. II Unpublished Op. at 5–6; Hutchinson Decl., CP at 120–124; 42 U.S.C. § 3617; RCW 49.60.2235.) Both RCW 49.60.2235 and its federal counterpart, 42 U.S.C. § 3617, reach attempts to coerce or intimidate individuals in the exercise

of housing rights, regardless of whether those attempts ultimately succeed. The Court of Appeals recognized that a claim under RCW 49.60.2235 does not require that a victim actually surrender the protected right; attempted coercion that places a person in an intolerable position because of protected status may be actionable. In this case, Ms. Hutchinson was confronted with precisely such an intolerable choice: keep the house or keep the job and reputation, (Div. II Unpublished Op. at 5–6; Hutchinson Decl., CP at 120.) That dilemma arose only after Respondent learned of Petitioner's mental health disabilities and her status as a disabled veteran utilizing VA compensation and a VA-loan benefits. (Div. II Unpublished Op. at 3–5; Hutchinson Decl., CP at 118–119.) Nonetheless, the courts below affirmed summary judgment by discounting substantial circumstantial evidence of discriminatory motive and by effectively requiring direct proof that Respondent's stated justification was false. (Div. II unpublished Op. App. A) That approach is difficult to reconcile with Washington law. (Scrivener v. Clark Coll., 181 Wn.2d 439, 444, 334 P.3d 541 (2014); Mikkelsen v. Pub. Util. Dist. No. 1, 189 Wn.2d 516, 526, 404 P.3d 464 (2017).) The Washington Supreme Court has repeatedly cautioned that "because it is difficult to prove discriminatory motivation, summary judgment is rarely appropriate in discrimination cases," and that where the record permits "reasonable but competing inferences of both discrimination and nondiscrimination, the trier of fact must determine the true motivation." (*Scrivener v. Clark Coll.*, 181 Wn.2d 439, 444, 334 P.3d 541 (2014); *Mikkelsen v. Pub. Util.* Dist. No. 1, 189 Wn.2d 516, 526, 404 P.3d 464 (2017). Here, the record contained ample evidence from which a jury could draw such competing inferences, including the timing of Respondent's threats immediately after learning of Petitioner's mental health disabilities and VA benefits, the severity and personal nature of those threats, and

Respondent's disparate treatment of Petitioner thereafter. (Div. II Unpublished Op. at 4–6; Hutchinson Decl., CP at 118–124.) By resolving questions of motive and intent as a matter of law, the decision below departed from the very principles articulated in *Scrivener* and *Mikkelsen* and risks undermining the protections RCW 49.60.2235 was enacted to secure. (Scrivener, 181 Wn.2d at 444; Mikkelsen, 189 Wn.2d at 526; RCW 49.60.2235.)

For instance:

Temporal Nexus. Respondent's coercive campaign unfolded immediately after he became aware of Petitioner's specific mental health diagnoses—including PTSD, anxiety, and depression—and her use of VA compensation and a VA-loan benefits. (Div. II Unpublished Op. at 1, 3–5; Hutchinson Decl., CP at 118–119.) The very next day after learning these details, Respondent told Petitioner that he did not want her as a neighbor and demanded that she abandon the home purchase. (Div. II Unpublished Op. at 5; Hutchinson Decl., CP at 120.) Such tight temporal proximity between protected disclosures and an adverse demand is classic circumstantial evidence of discriminatory motive, a point the Court of Appeals itself acknowledged in concluding that Petitioner had established a prima facie case. (Div. II Unpublished Op. at App. A)

Nature of the Threats. Respondent's conduct went far beyond a neutral contractual dispute. His statements and actions reflected personal hostility and stigmatization. (Div. II Unpublished Op. at 5; Hutchinson Decl., CP at 118–121.) Telling Petitioner "we don't trust you and don't want to be neighbors with you" immediately after she disclosed her mental health struggles is a loaded statement that a reasonable juror could find highly probative. (Hutchinson Decl., CP at 118–

120.) It suggests that Mr. Putka viewed Ms. Hutchinson as undesirable to live near—a perception reasonably tied to stigmatizing attitudes toward mental illness and disability. Moreover, Mr. Putka's threat to expose Petitioner to public shame (contacting the press about her license) and to professional ruin (reporting her to the DOH) if she did not capitulate, all while offering a quid pro quo of continued tenancy only if she walked away from the home, is precisely the kind of retaliatory intimidation that both 42 U.S.C. § 3617 and RCW 49.60.2235 are intended to prevent. (Div. II Unpublished Op. at 6; Hutchinson Decl., CP at 120–124; 42 U.S.C. § 3617; RCW 49.60.2235.) The severity and disproportionality of these threats support an inference of unlawful motive and raise an obvious question a jury should have been permitted to answer: why was Respondent so determined to prevent this disabled veteran from becoming his neighbor?

Pretextual Justification. Respondent claims that his conduct was motivated solely by concern over Petitioner's lapsed professional license and alleged dishonesty. (Div. II Unpublished Op. at 8.) A reasonable jury, however, could find that explanation incomplete or unconvincing. (Scrivener, 181 Wn.2d at 444; Mikkelsen, 189 Wn.2d at 526.) Petitioner presented evidence that Respondent's demeanor shifted sharply to overt antagonism only after he learned of the nature of her disabilities and her receipt of VA benefits. (Div. II Unpublished Op. at 4–5; Hutchinson Decl., CP at 118–119.) Prior to that point, he had been willing—indeed, enthusiastic—about selling the home to her, even knowing she was using a VA loan.

That inference is reinforced by the testimony of Petitioner's attorney, who attested that Respondent expressed "disgust" toward Petitioner rather than concern about licensure during negotiations. (Attorney Decl., CP at 166.) Notably, Respondent never raised the license issue in

communications with Petitioner's attorney, suggesting that the stated justification emerged later as a convenient explanation rather than the true motive. (Attorney Decl., CP at 166.) Additional circumstantial evidence further undermines Respondent's explanation. Immediately after these events, Respondent sought a backup buyer yet failed to disclose whether that buyer's financing avoided a VA loan. (Div. II Unpublished Op. at 5.) By producing only the first page of the backup offer and withholding the page reflecting financing terms, Respondent impeded Petitioner's ability to prove that he objected specifically to her VA-backed purchase. At the summary-judgment stage, that evidentiary gap should have been construed in Petitioner's favor, permitting a reasonable inference that the backup offer did not involve VA financing and that Respondent preferred not to deal with a VA-financed disabled veteran buyer. (Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 255 (1986); see also Reeves v. Sanderson Plumbing Prods., Inc., 530 U.S. 133, 150 (2000).)

Properly viewed, this case presents the question whether fair housing protections may be defeated at summary judgment by a defendant's facially neutral rationale, even when a plaintiff produces substantial circumstantial evidence that unlawful bias or retaliation was at least a contributing factor. (42 U.S.C. § 3617; RCW 49.60.2235; Scrivener, 181 Wn.2d at 444; Mikkelsen, 189 Wn.2d at 526.) The Washington courts effectively required Petitioner to disprove Respondent's explanation or produce a "smoking gun" admission of bias, a standard inconsistent with the remedial purposes of fair housing laws and this Court's guidance in discrimination cases. (Reeves, 530 U.S. at 147–48; 42 U.S.C. § 3617.)

As this Court has explained, once a plaintiff casts doubt on a defendant's stated reason and the overall evidence permits a finding of discrimination, the case must be submitted to a jury—even

in the absence of direct evidence of animus. *Reeves v. Sanderson Plumbing Prods., Inc.*, 530 U.S. 133, 148 (2000). Here, Petitioner was entitled to have a jury determine whether Respondent's extreme reaction stemmed from legitimate concerns or from prejudice—conscious or unconscious—against her as a mentally disabled veteran homebuyer. By denying that opportunity, the decision below departs from the generous construction civil rights statutes demand.

This Court's intervention is therefore necessary to ensure that state courts apply fair housing protections in a manner consistent with federal standards and constitutional guarantees. (U.S. Const. amend. XIV, § 1; 42 U.S.C. § 3617; RCW 49.60.2235.) At a minimum, certiorari should be granted to clarify that RCW 49.60.2235 is coextensive with 42 U.S.C. § 3617: that threats or coercion intended to drive a person away from housing on account of protected status or the assertion of housing rights are unlawful, and that such claims should rarely be resolved at summary judgment where motive is genuinely disputed. (42 U.S.C. § 3617; RCW 49.60.2235; Reeves, 530 U.S. at 147–48.) This clarification is of nationwide importance, as many states have adopted analogous provisions and a fragmented approach undermines the uniform expectation of freedom from housing intimidation. (42 U.S.C. § 3617.)

Procedural Irregularities and Due Process Violations.

Review is independently warranted because the proceedings below were tainted by significant procedural irregularities that deprived Petitioner of a full and fair opportunity to have her civil rights claim heard. (U.S. Const. amend. XIV, § 1) Although states retain discretion in structuring civil procedure, the Due Process Clause of the Fourteenth Amendment guarantees fundamental fairness, including the right to present evidence, the consistent application of governing rules,

and protection against arbitrary reversals of judicial rulings without justification. (U.S. Const. amend. XIV, § 1; Mathews v. Eldridge, 424 U.S. 319, 333 (1976).

Petitioner was denied these basic elements of fairness in multiple respects. At the first summary judgment stage, Petitioner was represented by counsel and opposed Respondent's motion under the burden-shifting framework applicable to discrimination claims. (McDonnell Douglas Corp. v. Green, 411 U.S. 792 (1973) The trial court denied summary judgment on the WLAD claim, expressly concluding that Respondent's motive presented a triable issue of fact and that a jury should determine whether his actions were taken in good faith or were discriminatory. (VRP at 38)That ruling allowed the case to proceed toward trial.

After discovery progressed and while Petitioner was proceeding without counsel, Respondent filed a renewed motion for summary judgment. (Div. II Unpublished Op. at 8.) The same judge who had previously found a genuine factual dispute reversed course and granted summary judgment, concluding that no such dispute existed. This reversal occurred on a record that Petitioner maintains was substantially the same as before. The only asserted "new" material consisted of a supplemental declaration from Respondent and a second deposition of Petitioner that largely reiterated her prior testimony. The core factual issue—Respondent's motive for threatening and coercing Petitioner—remained unchanged.

Ordinarily, reconsideration of a prior denial of summary judgment is justified only where there has been a material change in circumstances, such as genuinely new evidence or an intervening legal development that alters the governing analysis. (Mathews, 424 U.S. at 333.) No such change occurred here. Nonetheless, the trial court revisited and reversed its prior ruling, effectively short-circuiting Petitioner's right to a jury trial on the central issue of intent. This

unexplained about-face deprived Petitioner of the benefit of the court's own prior determination—on which she reasonably relied in preparing for trial—and foreclosed her claim without a clear procedural or legal basis.

Such use of summary judgment raises serious due process concerns. (U.S. Const. amend. XIV, § 1.) Once a court has determined that genuine issues of material fact exist, those issues are to be resolved by the fact-finder, not eliminated through renewed motion practice absent a meaningful change in the record. (Anderson, 477 U.S. at 255.) By reversing its earlier ruling without articulating a principled justification, the court below subjected Petitioner to arbitrary adjudication and denied her the "opportunity to be heard at a meaningful time and in a meaningful manner" that due process requires. (Mathews v. Eldridge, 424 U.S. 319, 333 (1976). This Court's review is warranted to ensure that summary judgment is not employed in a manner that abridges trial rights—particularly in civil rights cases where motive and intent are central and where a jury's role is constitutionally significant. (U.S. Const. amend. XIV, § 1; Anderson, 477 U.S. at 255.) Allowing courts to reverse prior determinations of factual dispute without clear standards or justification undermines confidence in the fairness and integrity of the judicial process and disproportionately harms litigants, like Petitioner, who proceed without counsel at critical stages of the litigation. (Mathews, 424 U.S. at 333.)

Exclusion and Disregard of Material Evidence.

Petitioner also suffered substantial prejudice from the courts' exclusion and disregard of material evidence supporting her claim, further compounding the due process violations in this case. (U.S. Const. amend. XIV, § 1) After summary judgment was granted, Petitioner moved for reconsideration and sought to present testimony from another disabled veteran whose

experience bore directly on Respondent's credibility and motive. The trial court summarily refused to consider this evidence. (Order Denying Reconsideration, App. B at 61.)

While procedural rules may permit courts to decline consideration of late-submitted evidence, the context here is critical. (Mathews, 424 U.S. at 333.) The proffered witness—herself a disabled veteran—would have testified that Respondent previously confronted her and threatened to expose a past criminal conviction unless she withdrew from a political election in which she was running against Respondent's wife. According to the proffer, Respondent justified this conduct as a matter of "public concern," a rationale Petitioner argued was pretextual and masked personal or discriminatory animus. This testimony closely paralleled Petitioner's own allegations: that Respondent targeted individuals he viewed as undesirable or problematic, threatened exposure of perceived "flaws," and rationalized coercive conduct as rule enforcement or civic duty.

If credited, this evidence would have demonstrated a pattern—or modus operandi—of intimidation directed at veterans or other vulnerable individuals to achieve Respondent's desired outcomes. It bore directly on Respondent's credibility and on whether his asserted justification in Petitioner's case was genuine or pretextual. (Reeves, 530 U.S. at 147–48.) By refusing even to hear this testimony, the trial court denied Petitioner any meaningful opportunity to rebut Respondent's characterization of his motives. (Order Denying Reconsideration, App. B at 61.) Given that summary judgment had already been entered, the refusal to consider this evidence on reconsideration effectively cemented the dismissal without a full evidentiary airing.

Additional fairness concerns arise from the handling of Petitioner's filings during review proceedings. (App. C at 62.) The Washington Supreme Court's denial order reflects that a motion to strike Petitioner's reply brief was granted and a motion to supplement the record (correcting the federal statute being used as guidance) was denied. To the extent procedural rules were applied mechanically to restrict a pro se litigant's ability to present argument or clarify the record, those rulings further raise concerns about unequal access to justice and the meaningful opportunity to be heard. (U.S. Const. amend. XIV, § 1; Mathews, 424 U.S. at 333.) . The appellate court's treatment of post-sale evidence likewise reflects an unduly restrictive approach that obscured the totality of circumstances. Although the Court of Appeals stated that there was "nothing in the record" to suggest the trial court ignored post-July 15 conduct, the trial court had expressly limited how such evidence could be considered during it's ruling in a motion for limine. The appellate analysis, in turn, emphasized that Respondent's actions after learning of Petitioner's disability were "consistent" with his asserted explanation regarding licensure, while discounting the retaliatory severity of Respondent's subsequent conduct—including eviction proceedings, a report to the local newspaper, public disparagement, and a small-claims action.

By characterizing these actions as partially explained by non-discriminatory factors, the courts below failed to credit a reasonable and powerful inference: that Respondent's follow-through on his threats corroborated the coercive and discriminatory nature of his intent. (Div. II Unpublished Op. App B; Hutchinson Decl., CP at 120–124.) Due process in civil litigation is not limited to formal notice and opportunity to file papers; it encompasses the quality and fairness of judicial consideration given to a litigant's evidence. (Mathews, 424 U.S. at 333.) Here,

Petitioner's evidence was filtered out through procedural rulings and restrictive evidentiary lenses, depriving her of a fair opportunity to have her case fully and fairly evaluated. (U.S. Const. amend. XIV, § 1)

If state courts may employ procedural mechanisms to eliminate civil rights claims before trial—after initially recognizing their validity—and may decline to consider probative evidence through hyper-technical application of rules, the promise of due process becomes illusory. (U.S. Const. amend. XIV, § 1.) This Court's intervention is necessary to reaffirm that summary judgment is not a vehicle for courts to resolve disputed questions of intent and motive, which are constitutionally committed to the jury, and that litigants (Anderson, 477 U.S. at 255.), particularly those proceeding pro se—are entitled to have their evidence heard and evaluated in a fundamentally fair manner. (Mathews, 424 U.S. at 333.) The extraordinary procedural course of this case, including the exclusion of material evidence, the trial courts reversal and the appellate court's endorsement of that process, warrants this Court's review to prevent a dangerous precedent in the enforcement of civil rights laws.

Equal Protection of the Laws.

This case raises a serious question concerning the equal protection of the laws in the administration of justice for protected classes, including veterans and persons with disabilities. (U.S. Const. amend. XIV, § 1.) The Washington Law Against Discrimination expressly prohibits discrimination in housing transactions on the basis of veteran or military status and disability. (RCW 49.60.030(1)(c); RCW 49.60.2235.) These statutory protections reflect a legislative

judgment that such groups have historically faced prejudice, stigma, and structural barriers, and therefore require heightened legal protection

When a disabled veteran comes before the courts seeking the benefit of those protections, and her claim is effectively nullified at the summary-judgment stage despite substantial evidence of coercion and intimidation, it calls into question whether she has received the "equal protection of the laws" guaranteed by the Fourteenth Amendment. Equal protection is not satisfied by the mere existence of statutory rights; it depends on how those rights are applied in practice. (U.S. Const. amend. XIV, § 1.)

Here, Petitioner was entitled to the equal protection of Washington's anti-discrimination laws. Instead, she was, in effect, denied that protection. A litigant without disabilities, or one not bearing the same combination of protected characteristics, might not have encountered the same judicial skepticism or evidentiary demands. The treatment of Petitioner's claim suggests that her status as a veteran with mental health disabilities—although explicitly protected by statute—resulted in her allegations being viewed through a more permissive lens for the defendant and a more exacting one for her.

By way of contrast, had Petitioner belonged to a different protected class, such as race or religion, and faced similarly explicit intimidation to abandon a housing contract, courts might reasonably be expected to exercise heightened caution before granting summary judgment. (Scrivener, 181 Wn.2d at 444; Reeves, 530 U.S. at 147–48.) Yet here, Respondent's conduct was treated as a potentially justified "business dispute," notwithstanding its coercive nature, while Petitioner was required to meet an elevated burden of proof inconsistent with the remedial purpose of anti-discrimination law. (RCW 49.60.2235.)

This differential treatment implicates the core concern of equal protection: the risk that certain protected classes receive diminished enforcement of the laws enacted for their benefit. (U.S. Const. amend. XIV, § 1; RCW 49.60.030(1)(c).) Petitioner's status as a disabled veteran should have prompted careful scrutiny of Respondent's motives. Instead, her claim was dismissed by effectively requiring direct evidence of animus or definitive proof that Respondent's stated justification was false, a standard not typically imposed at summary judgment in civil rights cases. (Div. II Unpublished Op. App. B; Reeves, 530 U.S. at 147–48.)

The unequal impact is compounded by Petitioner's intersectional status as a woman, a veteran, a person with psychiatric disabilities, and a pro se litigant at critical stages of the proceedings. Equal protection requires that individuals in such positions have the same meaningful opportunity to vindicate their rights as any other litigant. The record here suggests that Petitioner was not afforded that equal opportunity.

When courts conclude that a campaign of coercion against a disabled veteran is not actionable—despite statutes expressly designed to prohibit such conduct—they effectively deny that individual the equal protection of those laws. (U.S. Const. amend. XIV, § 1; RCW 49.60.2235) It sends a message that the law's promises to protect veterans and disabled individuals are hollow if the discrimination can be couched in a pretext of "dishonesty" or if the individual cannot personally unmask that pretext without a trial. Such outcomes risk signaling that statutory protections for veterans and persons with disabilities may be circumvented so long as discriminatory conduct is cloaked in a facially neutral rationale.

This Court's review is necessary to underscore that veterans and persons with disabilities are not second-class claimants under the law. (U.S. Const. amend. XIV, § 1.) The Fourteenth

Amendment requires state actors, including courts, to apply civil rights statutes evenhandedly and with vigilance against subtle or unconscious bias. By granting certiorari, the Court can reaffirm that equal protection demands consistent and robust enforcement of anti-discrimination laws for all protected classes and can correct the imbalance that occurred here by remanding for consideration under the proper legal standards. (U.S. Const. amend. XIV, § 1; 28 U.S.C. § 1257(a).)

Broader Significance.

The implications of this case extend beyond the immediate parties. (42 U.S.C. § 3617; RCW 49.60.2235.) As increasing numbers of veterans rely on VA loans and disability benefits to secure housing, it is essential that legal standards clearly prohibit retaliation and coercion based on veteran status. (42 U.S.C. § 3617; RCW 49.60.2235; RCW 49.60.030(1)(c).) Likewise, individuals with mental health disabilities continue to face misunderstanding and stigma. If courts permit ostensibly "rational" explanations to excuse conduct that a jury could reasonably view as discriminatory, those individuals are left without the protections the law promises. (Reeves, 530 U.S. at 147–48; Scrivener, 181 Wn.2d at 444.)

Granting certiorari would allow this Court to clarify that, where evidence permits an inference of discrimination, the claim belongs to the fact-finder, and to reinforce the principle that state anti-discrimination statutes must be applied consistently with the broad remedial purposes of federal civil rights law. (Reeves, 530 U.S. at 147–48; 42 U.S.C. § 3617.)

Broader Significance Beyond the Immediate Parties.

This case carries significance far beyond the dispute between the parties. The scenario it presents—a property owner coercing a buyer–tenant to abandon a housing contract because of

who that buyer is, namely a disabled veteran—is not isolated or anomalous. As the nation's veteran population grows, and as more veterans rely on VA loans and disability benefits to secure stable housing, it is essential that the legal standards governing fair housing clearly prohibit retaliation, coercion, and bias against them.

The same is true for individuals with mental health disabilities, who continue to face misunderstanding and stigma in housing and community settings. If courts permit ostensibly "rational" or facially neutral explanations to excuse conduct that a jury could reasonably view as discriminatory, those individuals are left without the meaningful protection that civil rights statutes are intended to provide. In such circumstances, the promise of equal access to housing becomes contingent on a victim's ability to produce direct proof of animus—an evidentiary burden that discrimination law has long recognized is rarely attainable.

Granting certiorari would allow this Court to clarify the proper standards governing summary judgment in discrimination cases, reaffirming that where the record contains evidence from which discrimination or retaliatory motive may reasonably be inferred, the claim belongs to the fact-finder. It would also provide needed guidance on the interpretation of state anti-discrimination statutes modeled on federal law, ensuring that they are applied consistently with the broad remedial purposes of federal civil rights enactments such as the Fair Housing Act. Without such clarification, the decision below risks standing as a precedent that weakens fair housing protections for veterans and persons with disabilities and signals that coercive conduct may escape accountability so long as it is framed in ostensibly neutral terms. This Court's review is therefore necessary to preserve the uniform and robust enforcement of civil rights protections nationwide. (42 U.S.C. § 3617; U.S. Const. amend. XIV, § 1.)

In summary, the petition should be granted because: (1) it presents an unresolved and important question concerning the scope of fair housing protections under state law and their proper alignment with federal law; (2) it presents a compelling instance of possible due process violation through procedural maneuvers that deprived a civil rights claimant of her day in court; and (3) it implicates fundamental equal protection principles, where a member of a protected class was denied the full and evenhanded application of the laws enacted for her protection. (RCW 49.60.2235; 42 U.S.C. § 3617; U.S. Const. amend. XIV, § 1; Mathews, 424 U.S. at 333.) The Court's intervention is necessary to correct these errors and to prevent the decision below from standing as a discouraging precedent to others seeking to vindicate their housing rights in Washington and beyond.

Conclusion

For the foregoing reasons, Petitioner Sara Hutchinson respectfully requests that this Court issue a writ of certiorari to review the judgment of the Washington Court of Appeals, review having been denied by the Washington Supreme Court. This Court should grant the petition in order to clarify the scope of protections against housing-related coercion and retaliation under statutes such as RCW 49.60.2235 and 42 U.S.C. § 3617, to reaffirm the proper standards for adjudicating discrimination claims at the summary judgment stage, and to ensure that fundamental constitutional guarantees of due process and equal protection are upheld for all individuals, including disabled veterans. Petitioner further asks that the Court, upon review, vacate the judgment below and remand for trial or such further proceedings as may be just, so that her claims may be heard on their merits by a jury of her peers.

Respectfully submitted,

Sara Hutchinson April 23rd, 2026

Sara Hutchinson Sara Hutchinson June, 30 2026

Petitioner, pro se

CERTIFICATE OF COMPLIANCE

This petition complies with the word limitation of Supreme Court Rule 33.1(g) because it contains 7771 words, excluding the parts of the petition exempted by Rule 33.1(d)

Sara Hutchinson April 23, 2026

Certificate of Service

I declare under perjury, according to the laws of the US supreme court, that on date that is written, I emailed and hand delivered a true and correct copy of this Petition For Writ Of Certiorari and that I have swerved the other party's attorney. I have served the other party via their email address and physical address

Meredith A. Long
1315 14th Avenue
Longview, WA 98632

meredith@longview-law.com

Dated this 23rd day of April 2026 30 June 2026

Sara Hutchinson Sara Hutchinson

Sara Hutchinson PRO SE