

Nos. 75934-1, 75956-1

SUPREME COURT OF THE STATE OF WASHINGTON

HEATHER ANDERSEN, ET AL., *Plaintiffs-Appellees,*

v.

KING COUNTY, *Defendant-Appellant,*

Appeal from King County Superior Court,
The Honorable William L. Downing

CELIA CASTLE, ET AL., *Plaintiffs-Appellees,*

v.

STATE OF WASHINGTON, *Defendant-Appellant.*

Appeal from Thurston County Superior Court,
The Honorable Richard D. Hicks

**GREATER SEATTLE BUSINESS ASSOCIATION AND
INLAND NORTHWEST BUSINESS ALLIANCE
MOTION TO FILE AMICUS CURIAE MEMORANDUM,
PURSUANT TO RAP 13.4(h)**

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**MOTION TO FILE AMICUS CURIAE MEMORANDUM,
PURSUANT TO RAP 13.4(h)**

I. Motion

The undersigned moves, pursuant to RAP 13.4(h), Rules of Appellate Procedure (2004 ed.), that this Court accept for filing the accompanying proposed amicus curiae memorandum in support of the petition for review in this case.

II. Background and Argument

In support of this motion, The Greater Seattle Business Association and Inland Northwest Business Alliance provide the following information and argument:

1. The Greater Seattle Business Association and Inland Northwest Business Alliance are not-for-profit corporations organized under the laws of the State of Washington, organized to foster, promote and support diverse business communities.

2. The undersigned is familiar with the briefing before the Court, and the issues presented on review. The petition for review raises questions about the interpretation and application RCW 26.04.010 and RCW 26.04.020(1)(c).

3. This Court's decision to affirm or reverse the trial courts' rulings in these cases will have a profound impact on the lives of Amici's members, employees, and families.

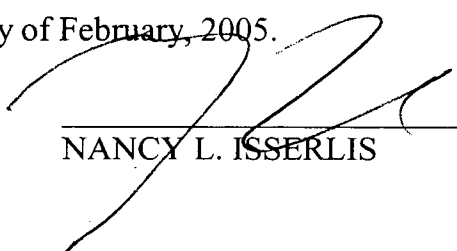
III. Relief Sought

The Greater Seattle Business Association and Inland Northwest Business Alliance request that the accompanying proposed amicus curiae memorandum be accepted for filing with the Court.

IV. Filing and Service of Motion and Proposed Amicus Curiae Memorandum

This motion and accompanying proposed amicus curiae memorandum will be served on counsel of record on this date by U.S. mail.

DATED this 14th day of February, 2005.



NANCY L. ISSERLIS