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2022 JAN 25 01:33 PM  
KING COUNTY  
SUPERIOR COURT CLERK  
E-FILED  
CASE #: 22-2-01234-0 SEA

SUPERIOR COURT OF THE STATE OF WASHINGTON  
FOR KING COUNTY

LORI HELLER, an individual; B.W., a minor  
child; Z.W., a minor child; and N.W., a minor  
child,

Plaintiffs,

v.

CAROLINE PLUMMER, an individual, and  
CAROLINE PLUMMER COUNSELING,  
PLLC, a Professional Limited Liability  
Company,

Defendants.

NO.

COMPLAINT FOR DAMAGES

Plaintiffs Lori Heller, B.W., Z.W., and N.W., suffered needless injuries and emotional  
distress as a direct result of Defendant Caroline Plummer's family therapy. Plaintiffs allege as  
follows:

**I. PARTIES**

1.1. ***Plaintiffs.*** At all relevant times, Plaintiffs Lori Heller, B.W., Z.W., and N.W.  
were residents of King County, Washington.

1.2. **Defendants.** At all relevant times, Defendant Caroline Plummer was a Licensed Mental Health Counselor authorized to conduct business in the state of Washington and did so in King County, Washington. Defendant Caroline Plummer Counseling, PLLC was a Washington Professional Limited Liability Company authorized to conduct business in the state of Washington and did so in King County, Washington. All acts and/or omissions described below with respect to Defendant Plummer were performed in the course and scope, and for the benefit of, Plummer's business Caroline Plummer Counseling, PLLC.

## II. JURISDICTION AND VENUE

2.1. **Subject Matter Jurisdiction.** The Court has subject matter jurisdiction over this action pursuant to RCW 2.08.010.

2.2. **Personal Jurisdiction.** The Court has personal jurisdiction over all parties.

2.3. **Venue.** Venue in King County, Washington is proper pursuant to RCW 4.12.020. At least one Defendant resides in King County, Washington, and the central acts that form the basis for this lawsuit occurred in King County, Washington.

## III. FACTUAL ALLEGATIONS

### A. Background.

3.1. B.W. (16 years old), Z.W. (14 years old), and N.W. (12 years old) ("the children") are Lori Heller's and her ex-husband K.W.'s biological children.

3.2. Heller and K.W. divorced in 2015.

3.3. In connection with their divorce, the two agreed to a parenting plan which was originally entered in August 2015 and again in January 2018.

3.4. Both parenting plans contained RCW 26.09.191(3) findings that K.W.'s "conduct may have an adverse effect on the children's best interests because of historical anger and

1 frustration issues which previously caused distress of the children and interfered with his  
2  
3 parenting abilities.”  
4

5 3.5. Jennifer Keilin was appointed as Parenting Coordinator (“PC”) in the 2018  
6  
7 parenting plan to oversee implementation of the parenting plan and address any parenting-related  
8  
9 issues—such as scheduling—as they arose.  
10

11 3.6. In December 2019, Keilin recommended in a Parenting Coordinator Report  
12  
13 suspension of K.W.’s residential time followed by supervised visitation with the children  
14  
15 because his uncontrolled anger and frustration continued to cause the children distress and  
16  
17 interfered with his parenting abilities.  
18

19 3.7. Keilin further reported that it was difficult for the children to speak up to their  
20  
21 father.  
22

23 3.8. For example, N.W. felt unable to tell her father she was uncomfortable showering  
24  
25 and sleeping in the same bed with him because she was afraid he would become enraged with  
26  
27 her.  
28

29 **B. Retention of Plummer.**  
30

31 3.9. In April 2020, Keilin recommended that the family participate in Alternatives for  
32  
33 Families Cognitive Behavioral Therapy (“AF-CBT”) to address the challenges in K.W.’s and the  
34  
35 children’s relationships and interactions.  
36

37 3.10. Keilin noted that, while the primary focus of the therapy would be on K.W. and  
38  
39 the children, Heller’s participation would be critical.  
40

41 3.11. Keilin recommended Caroline Plummer as the “family’s provider.”  
42

43 3.12. Heller and the children were told that Plummer would be the children’s advocate  
44  
45 in dealing with K.W.’s anger and frustration issues.

1 3.13. Plummer represented to Heller that she was the children's advocate.

2  
3 3.14. Both Keilin and Plummer told Heller and the children that Plummer would teach  
4 the children skills to speak up to their father about the things he did that scared them, including  
5 his frequent angry outbursts.  
6

7  
8 3.15. The children were looking forward to this therapy because they thought it would  
9 improve their respective relationships with their father.  
10

11 3.16. Heller and K.W. executed a contract with Plummer for her services.  
12

13 3.17. The contract stated, *inter alia*, that Plummer would "teach the father positive  
14 parenting skills and facilitate healing and positive communication between the father and the  
15 children."  
16  
17  
18  
19

20  
21 **C. Course of Treatment.**  
22

23 3.18. Plummer's therapy with Heller, K.W., and the children began in June 2020.  
24

25 3.19. B.W.'s therapist was initially concerned that Plummer's therapy with the family  
26 was starting too soon for B.W. given his trauma with his father.  
27

28 3.20. Plummer assured B.W.'s therapist that the family's therapy would be slow and at  
29 B.W.'s own pace.  
30

31 3.21. Contrary to her comments to B.W.'s therapist, Plummer's treatment of the family  
32 moved too quickly, failing to account for Heller's and the children's history of trauma with and  
33 emotional abuse by K.W.  
34  
35  
36

37 3.22. N.W. described feeling during the first session as if she was "walking into a trap."  
38

39 3.23. During that first visit, Plummer asked the children what about their father made  
40 them most anxious.  
41  
42  
43  
44  
45

1           3.24. The children were terrified to respond to Plummer’s question because they (1) felt  
2  
3 unsafe and (2) knew K.W. would get angry at them for their answers after the session.  
4

5           3.25. Indeed, K.W. “lost it” —that is, was enraged and upset—with the children after  
6  
7 their initial session.  
8

9           3.26. Plummer also brought up difficult, painful memories in the first few sessions with  
10  
11 the children.  
12

13           3.27. The children felt it was too soon to address these memories.  
14

15           3.28. Within one month, Plummer was pressing for exposure therapy with the children  
16  
17 and K.W.  
18

19           3.29. The children told Plummer that they were not ready to increase the amount of  
20  
21 time spent with their father at that point.  
22

23           3.30. Plummer ignored their request and continued to push to increase their time with  
24  
25 their father.  
26

27           3.31. As a result, Keilin continued to increase the time the children spent with their  
28  
29 father.  
30

31           3.32. In August 2020—after 2.5 months of therapy—Plummer reported that things were  
32  
33 “all better” between the children and K.W.  
34

35           3.33. This assertion caused the children distress because they did not feel like things  
36  
37 were good or better with their father.  
38

39 **D. Plummer’s direct mistreatment of Heller.**  
40

41           3.34. Although she had misgivings about Plummer’s therapy, Heller supported family  
42  
43 therapy with Plummer throughout the entire process and hoped it would be successful in  
44  
45 improving the relationships between the children and their father.

1           3.35. She also supports her children having a positive, healthy relationship with their  
2  
3 father.

4  
5           3.36. Early on in Plummer's involvement with the family, Plummer identified Heller as  
6  
7 resistant to therapy and a barrier to treatment.

8  
9           3.37. Plummer reprimanded Heller for bringing up her children's concerns about their  
10  
11 father to Plummer when the children did not feel comfortable talking to K.W. directly and when  
12  
13 the children did not feel like Plummer was listening to their concerns in session.

14  
15           3.38. Plummer continually accused Heller of undermining Plummer's therapeutic  
16  
17 relationships with the children and interfering with the therapeutic process.

18  
19           3.38.1. For example, Plummer yelled at Heller after a joint session with Z.W.  
20  
21 where Heller agreed with something Z.W. said. Plummer accused Heller of arguing with  
22  
23 Plummer and undermining her in front of Z.W. during that session.

24  
25           3.39. Plummer criticized Heller for being too anxious around the children but failed to  
26  
27 provide Heller with specific examples of Heller's anxiety or advise her on how to improve her  
28  
29 anxiety.

30  
31           3.40. Plummer also blamed Heller for the issues in the family.

32  
33           3.41. Eventually, Plummer hired an alienation expert to support her conclusion that  
34  
35 Heller was emotionally enmeshed with the children and engaging in alienation of Plummer.

36  
37 **E. Plummer regularly spoke ill of Heller to Keilin and improperly influenced and**  
38 **invaded Keilin's role as Parenting Coordinator.**

39  
40           3.42. Plummer and Keilin communicated and coordinated regularly with each other  
41  
42 regarding Heller, K.W., and the children.

1           3.43. Plummer and Keilin referred to each other as the “dynamic duo” and “super  
2  
3 women with superpowers” when it came to working with Heller’s family.  
4

5           3.44. Keilin instructed Heller and the children to report negative experiences with K.W.  
6  
7 to Plummer rather than Keilin.  
8

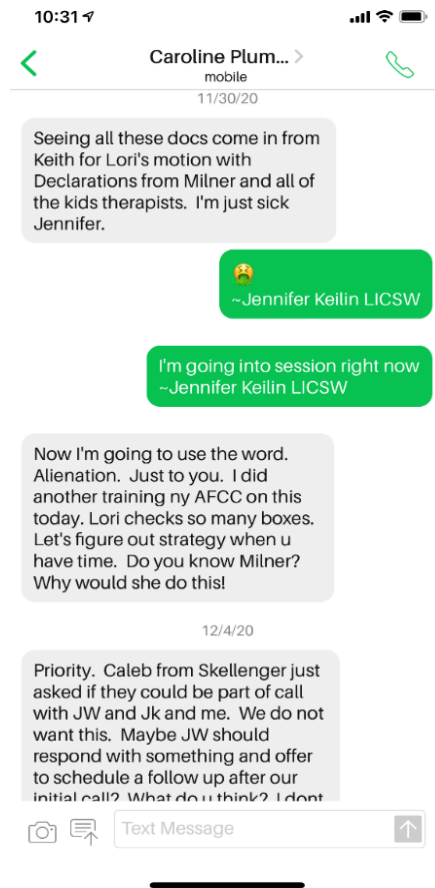
9           3.45. Keilin relied on Plummer’s often inaccurate accounts of events to make decisions  
10  
11 as PC without independently investigating issues on her own.  
12

13           3.46. When Heller tried to contact Keilin directly regarding her concerns about the  
14  
15 children and their experiences with their father, Keilin accused Heller of “splitting,” *i.e.*, trying  
16  
17 to work with Keilin as the “preferred provider” because Heller was unhappy with Plummer.  
18

19           3.46.1. In fact, Heller was concerned that Plummer was not heeding the  
20  
21 children’s reports about their father and was trying to help her children.  
22

23           3.47. Plummer would “vent” or “rant” about Heller to Keilin.  
24

25           3.48. Plummer accused Heller of alienation—despite never formally evaluating Heller  
26  
27 or having any evidence to support this allegation—in a text message conversation with Keilin:  
28  
29  
30  
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32  
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3.49. Plummer later told Keilin in an email that Heller was “encouraging the kids to report and exaggerate conflicts that happen *in every family* as a tactical maneuver to get the parenting plan she wants, keep the kids enmeshed with her, and drive a wedge into the relationship with their father.” (Italics in original).

3.50. Plummer made this assertion without ever observing any conversation between Heller and the children.

3.51. Shortly before Plummer withdrew from treating Heller’s family, Plummer wrote Keilin an email stating Heller (1) was actively soliciting from the children any potential negative events that may have happened while they were with their father; (2) was not supporting the



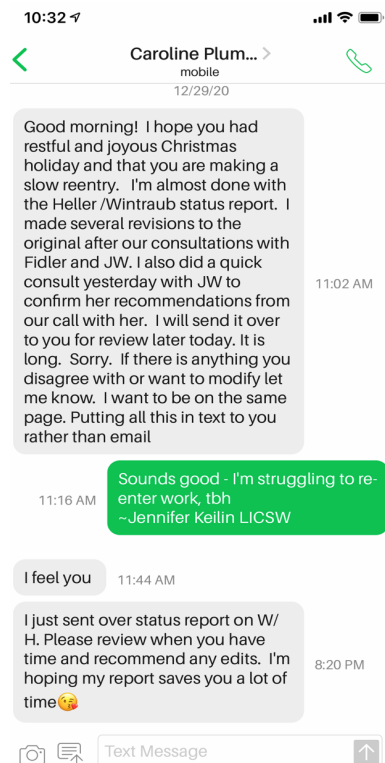
1 reunification process; (3) had invalidated Plummer's role with the children; and (4) was the  
2  
3 broken part of the family system and needed intervention.  
4

5 3.52. Plummer's numerous statements made to Keilin regarding Heller are untrue.  
6

7 3.53. Plummer also actively provided Keilin with proposed recommendations to make  
8  
9 as parenting coordinator—including recommending the amount of time the children should  
10  
11 spend with their father—which was beyond Plummer's role as family therapist.  
12

13 3.53.1. For example, Plummer made recommendations in her final status report  
14  
15 that Keilin lifted into her own report and recommendations.  
16

17 3.53.2. Plummer texted Keilin that she hoped her final status report "saves you a  
18  
19 lot of time:"  
20



1 **F. Plummer improperly acted as K.W.’s parent coach and advocate—rather than the**  
2 **children’s advocate—to the rest of the family’s detriment.**  
3

4 3.54. Throughout her treatment, Plummer failed or refused to recognize K.W.’s well-  
5  
6 documented harmful behavior towards the children and Heller.  
7

8 3.55. Plummer believed K.W.’s accounts of events, going so far as to admit in an email  
9  
10 to Keilin that she leaned toward believing K.W. over Heller and the children when it came to  
11  
12 reporting issues in the family.  
13

14 3.56. Plummer would reassure K.W. that he was in the right and defend his behavior to  
15  
16 the children and Heller.  
17

18 3.57. Plummer disclosed information to K.W. that the children asked her not to share  
19  
20 with him.  
21

22 3.58. K.W. would then confront the children about what Plummer told him, eroding  
23  
24 their trust in Plummer.  
25

26 3.59. N.W. confronted Plummer about sharing information with K.W. that N.W. asked  
27  
28 Plummer to keep confidential.  
29

30 3.60. Plummer admitted to the disclosure, apologized, and told N.W. that she would  
31  
32 keep N.W.’s secret “next time.”  
33

34 3.61. Despite this assurance, Plummer continued to disclose information to K.W. that  
35  
36 N.W. and B.W. asked her to keep confidential.  
37

38 3.62. Plummer also helped K.W. with his custody dispute after she withdrew from  
39  
40 treating the family, going so far as to advise K.W.’s therapist that Keilin was in Wintraub’s  
41  
42 “corner,” and should be kept on as parenting coordinator “at all costs.”  
43

44 Replacing this PC [Keilin] with a new one is a horrible idea. It  
45 takes a very long time to build a case the way we have done with

1 Keith and his family. The current PC believes that Keith has made  
2 tremendous progress. Keith should try and hold onto this PC at all  
3 costs, until at least the case settles and there is a final PP [parenting  
4 plan].

5  
6 Emphasis in original.

7  
8 3.63. Upon information and belief, Plummer and K.W. are still in contact, well after  
9  
10 Plummer stopped working with the family.

11  
12 **G. Plummer disbelieved the children's reports about their father and engaged in victim**  
13 **blaming.**

14  
15 3.64. Plummer ignored the children's well-documented history of trauma with, and fear  
16  
17 of, their father throughout her treatment.

18  
19 3.64.1. For example, she failed to consider that N.W.'s early-onset eating  
20  
21 disorder was related to her traumatic experiences with her father—even though N.W.'s  
22  
23 pediatrician attributed her eating disorder to those experiences.

24  
25 3.64.2. Plummer also refused to let the children conduct "feedback" sessions with  
26  
27 her from their mother's home, where they felt safer.

28  
29 3.65. When the children tried to tell Plummer about recent negative experiences (such  
30  
31 as angry outbursts or yelling) with their father during sessions, she completely dismissed them  
32  
33 and did not write anything down in her session notes.

34  
35 3.66. Plummer did not believe the children when they told her K.W. acted differently in  
36  
37 sessions with Plummer versus when she was not present.

38  
39 3.67. Plummer would accuse the children of lying, being defiant or disruptive, or  
40  
41 creating distortions given their past experiences with their father when they told her about his  
42  
43 anger episodes and fear of him.

1                   3.67.1. For example, in October 2020, Z.W. refused to visit his dad because he  
2  
3 was afraid of him.  
4

5                   3.67.2. Heller recognized Z.W. was having a trauma reaction to spending time  
6  
7 with his father—to the point that Z.W. would physically shake from fear of seeing him.  
8

9                   3.67.3. Plummer viewed Z.W.'s refusal and unwillingness to see his father as  
10  
11 defiance and accused Z.W. of being obstinate.  
12

13                   3.67.4. Days later, Plummer noted that Z.W. was “hypervigilant” during his visits  
14  
15 with K.W. and those visits were causing him distress he could not self-regulate.  
16

17                   3.67.5. Z.W. was so distressed and frustrated by Plummer's failure to listen to  
18  
19 him that he began banging his head on the wall during a session with his personal therapist.  
20

21                   3.67.6. Plummer's response was to recommend more exposure work around  
22  
23 Z.W.'s distress, *i.e.*, that Z.W. spend more time with his father.  
24

25                   3.67.7. Plummer eventually allowed Z.W. some temporary say in his visitation  
26  
27 with his father, but only *in exchange for* additional family therapy sessions with K.W.  
28

29                   3.67.8. In addition, Plummer called Z.W. and N.W. immature in their last  
30  
31 session.  
32

33                   3.68. Plummer made the children responsible for keeping K.W. happy and blamed them  
34  
35 if he yelled or got angry.  
36

37                   3.68.1. For example, after recounting an incident with K.W. to Plummer,  
38  
39 Plummer told N.W. that she “would have yelled at her too” if N.W. were her child.  
40

41                   3.68.2. Plummer also frequently told the children they needed to give K.W. more  
42  
43 positive feedback and that they would “overwhelm him” if they provided too many examples of  
44  
45

1 his behavior frightening them: she told the children that for every negative event they recalled,  
2  
3 they needed to share two positive events with their father.  
4

5 3.69. The children's therapists spoke to Plummer about their concerns with her  
6  
7 treatment methods for the children, but Plummer ignored them.  
8

9 3.70. The children eventually got to such a point of distrust of Plummer that they  
10  
11 refused to see her for therapy sessions.  
12

### 13 **H. Caroline Plummer's Withdrawal from Treatment.**

14  
15 3.71. Plummer withdrew from treating Heller, K.W., and the children in December  
16  
17 2020, after she deemed herself alienated by the children.  
18

19 3.72. She authored a final Status Report dated December 27, 2020, in which she  
20  
21 continued to villainize Heller and blame her for the failed treatment of the family and made  
22  
23 residential time recommendations which Keilin lifted directly into her own report and  
24  
25 recommendations.  
26

27 3.73. In the report, Plummer stated, *inter alia*, Heller was emotionally enmeshed with  
28  
29 the children, undermining Plummer's role, misrepresenting events, and unsupportive of the  
30  
31 therapy process.  
32

33 3.74. But an impartial arbitrator found in March 2021 there was no evidence that Heller  
34  
35 was the cause of the children's resistance to spending time or having a relationship with their  
36  
37 father.  
38

### 39 **I. Plummer failed to preserve text messages related to her treatment of Heller, K.W., 40 and their children.**

41  
42 3.75. After Plummer withdrew from treating Heller, K.W., and their children, Heller  
43  
44 subpoenaed her treatment file and any correspondence with and regarding with the family.  
45

1 3.76. Plummer failed to produce any text messages in response to the subpoena.

2  
3 3.77. When asked about text messages, Plummer explained via email to Heller's family  
4  
5 law attorney:

6  
7 I am unable to provide those to you. I primarily communicate  
8 with clients in person, or via telehealth and email communications.  
9 I infrequently use text messaging. In this case, ***I recall sending a***  
10 ***few text messages, but I believe the messages were not***  
11 ***substantive and did not save them.***  
12

13 (Emphasis added).  
14

15 3.78. Yet Keilin's Parenting Coordinator file contains numerous text messages between  
16  
17 Keilin and Plummer regarding the family.  
18

19 3.79. Plummer claims that she attempted to get the text messages restored with her cell  
20  
21 phone provider but was unsuccessful.  
22

23 3.80. Plummer's counsel subsequently clarified that Plummer did not have ***any*** text  
24  
25 messages related to treatment of the family on her phone, and that she objected to making her  
26  
27 phone available for forensic evaluation.  
28

29 **J. Current State of the Family.**  
30

31 3.81. Today, the children spend several days at a time with their father per Plummer's  
32  
33 recommendation, which was incorporated into the current parenting plan.  
34

35 3.82. The children hate this arrangement, as the quality of time spent with their father  
36  
37 declines over time, which all of the children told Plummer (and she ignored).  
38

39 3.83. The children report being on guard with their father constantly, waiting for  
40  
41 something to "set him off" each day.  
42

43 3.84. K.W. continues to lose his temper with the children, threaten them, and scream  
44  
45 that their "alienation" of him has to stop.

1           3.85. K.W. tells the children that they need to change—not him—based on Plummer’s  
2  
3 findings and recommendations.  
4

5           3.86. The goal of empowering the children to speak up to their father and repairing their  
6  
7 respective relationships remains unmet: the children are not comfortable telling their father  
8  
9 anything and report their relationships with him are worse than before Plummer’s treatment.  
10

11 **K. Damages.**  
12

13           3.87. Plummer’s support of K.W. during her treatment caused K.W. to continue to  
14  
15 litigate for additional time with his children under the parenting plan, resulting in Heller  
16  
17 incurring significant legal fees to defend against those efforts.  
18

19           3.88. As a result of Plummer’s treatment, Heller suffered anxiety, stress, extreme  
20  
21 concern for the welfare of her children, sleeplessness, and severe emotional distress causing her  
22  
23 to lose 20 pounds.  
24

25           3.89. Heller had to engage in her own therapy to help cope with the harm caused by  
26  
27 Plummer.  
28

29           3.90. B.W. has had to continue with therapy to help cope with the harm caused by  
30  
31 Plummer.  
32

33           3.91. B.W. reports that, as a direct result of Plummer’s treatment, he cannot trust other  
34  
35 people, particularly therapists.  
36

37           3.92. B.W. also reports that hearing certain words Plummer would routinely use to  
38  
39 discredit B.W.’s accounts of events (*e.g.*, “catastrophizing,” “fortune telling,” “hypervigilance”)  
40  
41 invoke a trauma reaction of anxiousness, heart racing, flushing, and excessive sweating.  
42

43           3.93. Z.W. has had to continue with therapy to help cope with the harm caused by  
44  
45 Plummer.

3.94. Z.W. reports that, as a direct result of Plummer's treatment, he has suffered stress, emotional distress, suicidal ideation, and depression.

3.95. Z.W. has also had to go on medication for his depression and for abdominal pain he experiences after visiting his father.

3.96. N.W. has had to continue with therapy to help cope with the harm caused by Plummer.

3.97. N.W. reports that, as a direct result of Plummer's treatment, she did not trust her long-term therapist for a period of time and continues to have trust issues with adults, including her school counselor, whom she fears will not listen to her or will go behind her back to tell her father things about her.

3.98. As a direct result of Plummer's treatment, all three children report that their relationships with their father are far worse than before Plummer became involved with their family.

3.99. They report Plummer has ruined any chance of the children having a relationship with their father. They have no desire to see him.

#### IV. CAUSES OF ACTION

4.1. ***Incorporation by Reference.*** Plaintiffs reallege the allegations of paragraphs 1.1 through 3.99 above.

4.2. ***Breach of Contract.*** Heller and Plummer entered into an agreement for Plummer to provide family therapy. Plummer failed to teach K.W. positive parenting skills, facilitate healing and positive communication between the father and the children, and otherwise fulfill the promises made in her contract with Heller. As a direct and proximate result of these breaches,



1 Plaintiffs were deprived of the benefits owed by Plummer and incurred damages in an amount to  
2  
3 be proven at trial.  
4

5 4.3. **Breach of Fiduciary Duty.** Plummer breached her fiduciary duty to Plaintiffs as  
6  
7 their family therapist as described above by, *inter alia*, violating confidentiality, not believing the  
8  
9 children's accounts of experiences with their father, recommending the children spend increased  
10  
11 time with K.W., victim blaming, acting as K.W.'s advocate, disparaging Heller, and otherwise  
12  
13 not acting in Plaintiffs' best interests. As a direct and proximate result of these breaches,  
14  
15 Plaintiffs suffered damages in an amount to be proven at trial.  
16

17 4.4. **Violation of the Standard of Care and Chapter 7.70 RCW.** Plummer violated  
18  
19 the standard of care and engaged in professional negligence as described above by, *inter alia*,  
20  
21 pushing the pace of therapy and visitation too quickly, failing to recognize the children's history  
22  
23 of trauma and use appropriate treatment techniques for individuals with a history of trauma and  
24  
25 emotional abuse, violating confidentiality, not believing the children's accounts of experiences  
26  
27 with their father, victim blaming, acting as K.W.'s advocate, disparaging Heller, and using her  
28  
29 position to improperly influence and invade the role of Keilin as parenting coordinator. As a  
30  
31 direct and proximate result of these acts, Plaintiffs suffered damages in an amount to be proven  
32  
33 at trial.  
34

35 4.5. **Harassment.** As described above, Plummer knowingly and willfully engaged in a  
36  
37 course of conduct directed at Plaintiffs that seriously alarmed, annoyed, or harassed Plaintiffs,  
38  
39 which served no legitimate or lawful purpose, would cause a reasonable person to suffer  
40  
41 substantial emotional distress, and did directly and proximately cause Plaintiffs' significant  
42  
43 emotional distress.  
44  
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4.6. ***Intentional Infliction of Emotional Distress.*** Plummer's conduct alleged herein was extreme and outrageous and undertaken with intent to inflict emotional distress on Plaintiffs or with reckless disregard for the likelihood that it would result in emotional distress. As a direct and proximate result of Plummer's extreme and outrageous conduct, Plaintiffs suffered severe emotional distress and have been damaged in an amount to be proven at trial.

4.7. ***Defamation – Plaintiff Lori Heller.*** Plummer represented to Keilin that Heller was, *inter alia*, encouraging or “actively soliciting” the children to report and exaggerate conflicts or negative events with their father, not supportive of the therapy process, undermining Plummer’s role, and misrepresenting events as described above. These factual representations were false and defamatory, not privileged, and Plummer knew them to be false, or in the exercise of reasonable care, should have known them to be false. As a result of Plummer’s false statements, Heller has been damaged in an amount to be proven at trial.

## V. REQUEST FOR RELIEF

As a result of the foregoing, Plaintiffs request the following relief:

5.1. ***Compensatory Damages.*** For an award of money damages in an amount to be proven at trial.

5.2. ***Prejudgment Interest.*** For an award of prejudgment interest on all liquidated amounts.

5.3. ***Attorney's Fees and Costs.*** For Plaintiffs' attorney's fees and costs as allowed by law.

5.4. ***Other Relief.*** For such further relief as the Court deems just and equitable.

1 DATED this 25<sup>th</sup> day of January, 2022.  
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