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CASE NUMBER: 15-2-28905-5 SEA

Honorable Catherine Shaffer

SUPERIOR COURT OF WASHINGTON
FOR KING COUNTY

MIN KYEONG KANG,

Plaintiff,

v.

RIDE THE DUCKS INTERNATIONAL,
LLC, a foreign company; RIDE THE
DUCKS OF SEATTLE, LLC, a Washington
company; ERIC BISHOP and JANE DOE
BISHOP, and their marital community;
STATE OF WASHINGTON; CITY OF
SEATTLE,

Defendants.

No. 15-2-28905-5 SEA
[Consolidated]

Already filed in:
No. 16-2-19995-0 SEA

RIDE THE DUCKS OF SEATTLE,
LLC'S ANSWER TO PLAINTIFF'S
FIRST AMENDED COMPLAINT FOR
PERSONAL INJURIES, DAMAGES,
AND PUNITIVE RELIEF

COMES NOW Defendant Ride the Ducks of Seattle, LLC ("RTD of Seattle Defendant"), by and through its counsel of record, and hereby answers Plaintiff's First Amended Complaint for Personal Injuries, Damages, and Punitive Relief ("Complaint") as follows with the paragraph numbers below coinciding with the paragraph numbering of the Complaint that is being responded to. In answering Plaintiff's Complaint, which contains multiple allegations in most paragraphs, and often a number of allegations embedded into individual sentences, RTD of Seattle Defendant is aware that it could be interpreted that a particular allegation was neither admitted nor denied in this Answer. Therefore, in addition to the admissions and denials set forth below, RTD of Seattle Defendant denies any allegation of the Complaint which is not expressly admitted or denied below.

RTD OF SEATTLE DEFENDANT'S ANSWER TO
PLAINTIFF'S FIRST AMENDED COMPLAINT - 1
564859

PATTERSON BUCHANAN
FOBES & LEITCH, INC., P.S.

2112 Third Avenue, Suite 500, Seattle WA 98121
Tel. 206.462.6700 Fax 206.462.6701

1 Defendants Eric Bishop and Jane Doe Bishop have been dismissed from the matters
2 arising from the September 24, 2015 incident. Nevertheless, responses to allegations involving
3 Bishops are set out below.

4 **ANSWER**

5 **I. PARTIES**

6 1.1 This answering Defendant is without knowledge or information sufficient to
7 form a belief as to the truth of the allegations.

8 1.2 The allegations in the corresponding paragraph are not directed at this answering
9 Defendant and therefore no response is required.

10 1.3 Admit.

11 1.4 This answering Defendant admits that Eric Bishop was an employee of RTD of
12 Seattle, LLC, and that Mr. Bishop was working within the course and scope of his employment
13 at the time of the accident. This answering Defendant further admits that Mr. Bishop was
14 driving Duck 6, and that Mr. Bishop was a citizen of the State of Washington at the time of the
15 accident. This answering Defendant denies any remaining allegations in the corresponding
16 paragraph.

17 1.5 The allegations in the corresponding paragraph are not directed at this answering
18 Defendant and therefore no response is required. To the extent a response is required, this
19 answering Defendant is without sufficient knowledge or information to form a belief as to the
20 truth of the allegations and therefore denies them.

21 1.6 The allegations in the corresponding paragraph are not directed at this answering
22 Defendant and therefore no response is required. To the extent a response is required, this
23 answering Defendant is without sufficient knowledge or information to form a belief as to the
24 truth of the allegations and therefore denies them.

1 1.7 The allegations contained in this paragraph do not contain any factual
2 allegations requiring a response. To the extent a response is required, this answering Defendant
3 denies any allegations in the corresponding paragraph.

4 **II. JURISDICTION, VENUE, AND TORT CLAIMS**

5 2.1 Admit.

6 2.2 This answering Defendant admits jurisdiction is proper in Washington State
7 because the Complaint alleges causes of action arising out of activities within Washington
8 State, including the transaction of business within the State and the alleged commission of
9 alleged tortious acts; Ride the Ducks of Seattle has its principal place of business in
10 Washington; Eric Bishop was a resident of the State of Washington at the time of the accident;
11 and the Government Entity Defendants are of this State. This answering Defendant denies any
12 remaining allegations in the corresponding paragraph.

13 2.3 Admit.

14 2.4 The allegations in the corresponding paragraph are not directed at this answering
15 Defendant and therefore no response is required. To the extent a response is required, RTD of
16 Seattle admits it entered into a licensing agreement with Ride the Ducks International ("RTD
17 International"), which speaks for itself, and denies all other allegations in the corresponding
18 paragraph.

19 2.5 The allegations in the corresponding paragraph call for a legal conclusion;
20 therefore, no response is required.

21 2.6 This answering Defendant is without sufficient information to form a belief as to
22 the truth of the allegations in the corresponding paragraph and therefore denies them.

23 2.7 This answering Defendant is without sufficient information to form a belief as to
24 the truth of the allegations in the corresponding paragraph and therefore denies them.
25

III. FACTS

3.1 This answering Defendant admits that on September 24, 2015, at approximately 11:11 a.m., Duck 6 – an amphibious vehicle – was traveling northbound on SR 99 Aurora Bridge. This answering Defendant further admits that Duck 6 was manufactured by RTD International and operated by Ride the Ducks of Seattle after it was purchased from RTD International. This answering Defendant denies any remaining allegations in the corresponding paragraph.

3.2 Admit.

3.3 Admit.

3.4 This answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations.

3.5 Admit.

3.6 This answering Defendant admits that Duck 6 crossed the centerline of the SR 99 Aurora Bridge into oncoming southbound lanes of traffic and then struck the left side of a motor coach. This answering Defendant denies any remaining allegations in the corresponding paragraph. To the extent this unauthenticated picture contains any averments, this answering Defendant is without sufficient information to form a belief as to the truth of the allegations and therefore denies the same.

3.7 Admit.

3.8 This answering Defendant admits the National Transportation and Safety Board investigated the crash. This answering Defendant is without sufficient information to form a belief as to the truth of any remaining allegations and therefore denies them. To the extent these unauthenticated pictures contain any averments, this answering Defendant is without sufficient information to form a belief as to the truth of the allegations and therefore denies the same.

3.9 This answering Defendant admits that Duck 6 is an amphibious vehicle that was

1 manufactured by Ride the Ducks International. This answering Defendant is without sufficient
2 information to form a belief as to the truth of any remaining allegations and therefore denies
3 them.

4 3.10 This answering Defendant admits that RTD of Seattle has used the quoted
5 passage in advertising. This answering Defendant denies any remaining allegations.

6 3.11 This answering Defendant admits that RTD International sold Duck 6 to RTD of
7 Seattle in approximately 2005, but denies any remaining allegations.

8 3.12 This answering Defendant admits that a licensing agreement existed between
9 RTD of Seattle and RTD International and that agreement speaks for itself. This answering
10 Defendant denies any remaining allegations subject to clarification through the discovery
11 process.

12 3.13 The allegations in the corresponding paragraph are not directed at this answering
13 Defendant and therefore no response is required. To the extent a response is required, this
14 answering Defendant is without sufficient information to form a belief as to the truth of the
15 allegations and therefore denies them.

16 3.14 The allegations in the corresponding paragraph are not directed at this answering
17 Defendant and therefore no response is required. To the extent a response is required, this
18 answering Defendant is without sufficient information to form a belief as to the truth of the
19 allegations and therefore denies them.

20 3.15 The allegations in the corresponding paragraph are not directed at this answering
21 Defendant and therefore no response is required. To the extent a response is required, this
22 answering Defendant is without sufficient information to form a belief as to the truth of the
23 allegations and therefore denies them.

24 3.16 The allegations in the corresponding paragraph are not directed at this answering
25 Defendant and therefore no response is required. To the extent a response is required, this

1 answering Defendant is without sufficient information to form a belief as to the truth of the
2 allegations and therefore denies them.

3 3.17 The allegations in the corresponding paragraph are vague and ambiguous, and
4 on that basis alone, RTD of Seattle Defendant denies these allegations generally and
5 specifically subject to clarification through the discovery process.

6 3.18 The allegations in the corresponding paragraph are vague and ambiguous, and
7 on that basis alone, RTD of Seattle Defendant denies these allegations generally and
8 specifically subject to clarification through the discovery process.

9 3.19 Deny.

10 3.20 This allegation references a newspaper article, which speaks for itself. With
11 respect to the factual allegations contained therein, this answering Defendant is without
12 sufficient information to form a belief as to the truth of the allegations in the corresponding
13 paragraph and therefore denies them.

14 3.21 The allegations in the corresponding paragraph are not directed at this answering
15 Defendant and therefore no response is required. To the extent a response is required, this
16 answering Defendant is without sufficient information to form a belief as to the truth of the
17 allegations and therefore denies them.

18 3.22 This answering Defendant denies that the NTSB has possession of Duck 6 or its
19 component parts. This answering Defendant is without sufficient information to form a belief
20 as to the truth of any remaining allegations and therefore denies them.

21 3.23 This answering Defendant admits that Ride the Ducks of Seattle agreed to
22 temporarily suspend operations pending a thorough inspection by the Washington State
23 Utilities and Transportation Commission's ("WUTC") staff. Following that inspection, Ride
24 the Ducks of Seattle has been authorized by the WUTC to resume operations. This answering
25 Defendant denies any remaining allegations in the corresponding paragraph.

1 3.24 This answering Defendant admits that the WUTC released a report on December
2 15, 2015, and that report speaks for itself. This answering Defendant denies any remaining
3 allegations.

4 3.25 Deny.

5 3.26 This answering Defendant admits that the WUTC allowed RTD of Seattle to
6 resume operation of its non-stretch vehicles on December 21, 2015. This answering Defendant
7 denies any remaining allegations.

8 3.27 This answering Defendant is without knowledge or information sufficient to
9 form a belief as to the truth of the allegations and therefore denies them.

10 3.28 This answering Defendant admits that RTD of Seattle has informed the WUTC
11 and the City of Seattle of its desire to no longer use the Aurora Bridge. This answering
12 Defendant denies any remaining allegations in the corresponding paragraph.

13 3.29 This answering Defendant admits that RTD of Seattle has informed the WUTC
14 and the City of Seattle that it will use the Fremont Bridge. This answering Defendant is
15 without sufficient knowledge or information to form a belief as to the truth of any remaining
16 allegations and therefore denies them.

17 3.30 Admit.

18 3.31 Admit.

19 3.32 Admit the allegations in the corresponding paragraph, but to the extent this
20 unauthenticated picture contains any averments, this answering Defendant is without sufficient
21 information to form a belief as to the truth of the allegations and therefore denies the same.

22 3.33 This answering Defendant is without sufficient information to form a belief as to
23 the truth of the allegations in the corresponding paragraph and therefore denies them.

24 3.34 This answering Defendant is without sufficient information to form a belief as to
25 the truth of the allegations in the corresponding paragraph and therefore denies them.

1 3.35 This answering Defendant is without sufficient information to form a belief as to
2 the truth of the allegations in the corresponding paragraph and therefore denies them.

3 3.36 This answering Defendant is without sufficient information to form a belief as to
4 the truth of the allegations in the corresponding paragraph and therefore denies them.

5 3.37 This answering Defendant admits that a suicide-prevention fence was built on
6 the Aurora Bridge, but is without sufficient information to form a belief as to the truth of the
7 allegations remaining in the corresponding paragraph and therefore denies them.

8 3.38 This answering Defendant is without sufficient information to form a belief as to
9 the truth of the allegations in the corresponding paragraph and therefore denies them.

10 3.39 This answering Defendant is without sufficient information to form a belief as to
11 the truth of the allegations in the corresponding paragraph and therefore denies them.

12 3.40 This answering Defendant admits the Aurora Bridge has six lanes of travel,
13 three northbound and three southbound. This answering Defendant is without sufficient
14 information to form a belief as to the truth of any remaining allegations in the corresponding
15 paragraph and therefore denies them.

16 3.41 This answering Defendant is without sufficient information to form a belief as to
17 the truth of the allegations in the corresponding paragraph and therefore denies them.

18 3.42 This answering Defendant denies the allegations as stated.

19 3.43 This answering Defendant is without sufficient information to form a belief as to
20 the truth of the allegations in the corresponding paragraph and therefore denies them.

21 3.44 This answering Defendant is without sufficient information to form a belief as to
22 the truth of the allegations in the corresponding paragraph and therefore denies them.

23 3.45 Admit.

24 3.46 This answering Defendant is without sufficient information to form a belief as to
25 the truth of the allegations in the corresponding paragraph and therefore denies them.

1 3.47 This answering Defendant is without sufficient information to form a belief as to
2 the truth of the allegations in the corresponding paragraph and therefore denies them.

3 3.48 This answering Defendant is without sufficient information to form a belief as to
4 the truth of the allegations in the corresponding paragraph and therefore denies them. To the
5 extent this unauthenticated chart contains any averments, this answering Defendant is without
6 sufficient information to form a belief as to the truth of the allegations and therefore denies the
7 same.

8 3.49 This answering Defendant is without sufficient information to form a belief as to
9 the truth of the allegations in the corresponding paragraph and therefore denies them.

10 3.50 This answering Defendant is without sufficient information to form a belief as to
11 the truth of the allegations in the corresponding paragraph and therefore denies them.

12 3.51 This answering Defendant admits that there are no center barriers on the SR 99
13 Aurora Bridge. This answering Defendant is without sufficient information to form a belief as
14 to the truth of any remaining allegations in the corresponding paragraph and therefore denies
15 them. To the extent this unauthenticated picture contains any averments, this answering
16 Defendant is without sufficient information to form a belief as to the truth of the allegations and
17 therefore denies the same.

18 3.52 This answering Defendant is without sufficient information to form a belief as to
19 the truth of the allegations in the corresponding paragraph and therefore denies them.

20 3.53 This answering Defendant is without sufficient information to form a belief as to
21 the truth of the allegations in the corresponding paragraph and therefore denies them.

22 3.54 This answering Defendant is without sufficient information to form a belief as to
23 the truth of the allegations in the corresponding paragraph and therefore denies them.

24 3.55 This answering Defendant is without sufficient information to form a belief as to
25 the truth of the allegations in the corresponding paragraph and therefore denies them. To the
extent this unauthenticated chart contains any averments, this answering Defendant is without

1 sufficient information to form a belief as to the truth of the allegations and therefore denies the
2 same.

3 3.56 This answering Defendant is without sufficient information to form a belief as to
4 the truth of the allegations in the corresponding paragraph and therefore denies them.

5 3.57 This answering Defendant is without sufficient information to form a belief as to
6 the truth of the allegations in the corresponding paragraph and therefore denies them.

7 3.58 This answering Defendant is without sufficient information to form a belief as to
8 the truth of the allegations in the corresponding paragraph and therefore denies them.

9 3.59 This answering Defendant is without sufficient information to form a belief as to
10 the truth of the allegations in the corresponding paragraph and therefore denies them.

11 3.60 This answering Defendant is without sufficient information to form a belief as to
12 the truth of the allegations in the corresponding paragraph and therefore denies them.

13 3.61 This answering Defendant is without sufficient information to form a belief as to
14 the truth of the allegations in the corresponding paragraph and therefore denies them.

15 3.62 This answering Defendant is without sufficient information to form a belief as to
16 the truth of the allegations in the corresponding paragraph and therefore denies them.

17 3.63 The allegations in the corresponding paragraph are not directed at this answering
18 Defendant and therefore no response is required. To the extent a response is required, this
19 answering Defendant is without sufficient information to form a belief as to the truth of the
20 allegations and therefore denies them.

21 3.64 This answering Defendant admits the quoted passage has been attributed to
22 Brian Tracey, President of RTD of Seattle, but denies any remaining allegations.

23 3.65 This answering Defendant is without sufficient information to form a belief as to
24 the truth of the allegations as stated in the corresponding paragraph and therefore denies them.

25 3.66 This answering Defendant is without sufficient information to form a belief as to
the truth of the allegations as stated in the corresponding paragraph and therefore denies them.

1 3.67 This answering Defendant admits Brian Tracey submitted a City of Seattle land
2 use application on behalf of one of his investment groups in approximately March 2012. This
3 answering Defendant further admits the application's purpose was to build a private access
4 ramp into Lake Union for RTD Seattle, but denies any remaining allegations.

5 3.68 This answering Defendant is without sufficient information to form a belief as to
6 the truth of the allegations as stated in the corresponding paragraph and therefore denies them.

7 3.69 The allegations in the corresponding paragraph call for a legal conclusion;
8 therefore, no response is required. To the extent a response is required, this answering
9 Defendant is without sufficient information to form a belief as to the truth of the allegations and
10 therefore denies them.

11 3.70 This answering Defendant is without sufficient information to form a belief as to
12 the truth of the allegations in the corresponding paragraph and therefore denies them.

13 3.71 This answering Defendant is without sufficient information to form a belief as to
14 the truth of the allegations in the corresponding paragraph and therefore denies them.

15 3.72 This answering Defendant is without sufficient information to form a belief as to
16 the truth of the allegations in the corresponding paragraph and therefore denies them.

17 3.73 This answering Defendant is without sufficient information to form a belief as to
18 the truth of the allegations in the corresponding paragraph and therefore denies them.

19 3.74 This answering Defendant is without sufficient information to form a belief as to
20 the truth of the allegations in the corresponding paragraph and therefore denies them.

21 3.75 This answering Defendant is without sufficient information to form a belief as to
22 the truth of the allegations in the corresponding paragraph and therefore denies them.

23 3.76 This answering Defendant is without sufficient information to form a belief as to
24 the truth of the allegations in the corresponding paragraph and therefore denies them.

25 3.77 This answering Defendant is without sufficient information to form a belief as to
the truth of the allegations in the corresponding paragraph and therefore denies them.

1 3.78 This answering Defendant admits that five individuals died in the accident. This
2 answering Defendant is without sufficient information to form a belief as to the truth of any
3 remaining allegations, including the specific number of claimed injuries and therefore denies
4 them. To the extent this unauthenticated picture contains any averments, this answering
5 Defendant is without sufficient information to form a belief as to the truth of the allegations and
6 therefore denies the same.

7 3.79 This answering Defendant is without sufficient information to form a belief as to
8 the truth of the allegations in the corresponding paragraph and therefore denies them.

9 3.80 This answering Defendant is without sufficient information to form a belief as to
10 the truth of the allegations in the corresponding paragraph and therefore denies them.

11 3.81 This answering Defendant is without sufficient information to form a belief as to
12 the truth of the allegations in the corresponding paragraph and therefore denies them. To the
13 extent this unauthenticated picture contains any averments, this answering Defendant is without
14 sufficient information to form a belief as to the truth of the allegations and therefore denies the
15 same.

16 IV. LIABILITY

17 4.1 The allegations in the corresponding paragraph are not directed at this answering
18 Defendant and call for a legal conclusion; therefore, no response is required. To the extent a
19 response is required, this answering Defendant is without sufficient information to form a belief
20 as to the truth of the allegations and therefore denies them.

21 4.2 The allegations in the corresponding paragraph are not directed at this answering
22 Defendant and therefore no response is required. To the extent a response is required, this
23 answering Defendant admits that RTD International manufactured Duck 6 and is without
24 sufficient information to form a belief as to the truth of any remaining allegations and therefore
25 denies them.

1 4.3 The allegations in the corresponding paragraph are not directed at this answering
2 Defendant and call for a legal conclusion; therefore, no response is required. To the extent a
3 response is required, this answering Defendant is without sufficient information to form a belief
4 as to the truth of the allegations and therefore denies them.

5 4.4 The allegations in the corresponding paragraph are not directed at this answering
6 Defendant and therefore no response is required. To the extent a response is required, this
7 answering Defendant is without sufficient information to form a belief as to the truth of the
8 allegations and therefore denies them.

9 4.5 The allegations in the corresponding paragraph are not directed at this answering
10 Defendant and therefore no response is required. To the extent a response is required, this
11 answering Defendant is without sufficient information to form a belief as to the truth of the
12 allegations and therefore denies them.

13 4.6 The allegations in the corresponding paragraph are not directed at this answering
14 Defendant and therefore no response is required. To the extent a response is required, this
15 answering Defendant is without sufficient information to form a belief as to the truth of the
16 allegations and therefore denies them.

17 4.7 The allegations in the corresponding paragraph are not directed at this answering
18 Defendant and therefore no response is required. To the extent a response is required, this
19 answering Defendant is without sufficient information to form a belief as to the truth of the
20 allegations and therefore denies them.

21 4.8 Deny.

22 4.9 This answering Defendant admits the principles of vicarious liability apply for
23 the acts or omissions of Ride the Ducks of Seattle, LLC's employee, Eric Bishop. This
24 answering Defendant expressly denies Eric Bishop acted negligently or committed wrongdoing
25 of any kind.

 4.10 Deny.

1 4.11 Deny.

2 4.12 The allegations in the corresponding paragraph are not directed at this answering
3 Defendant and therefore no response is required. To the extent a response is required, this
4 answering Defendant is without sufficient information to form a belief as to the truth of the
5 allegations and therefore denies them.

6 4.13 The allegations in the corresponding paragraph are not directed at this answering
7 Defendant and therefore no response is required. To the extent a response is required, this
8 answering Defendant is without sufficient information to form a belief as to the truth of the
9 allegations and therefore denies them.

10 4.14 The allegations in the corresponding paragraph are not directed at this answering
11 Defendant and therefore no response is required. To the extent a response is required, this
12 answering Defendant is without sufficient information to form a belief as to the truth of the
13 allegations and therefore denies them.

14 4.15 The allegations in the corresponding paragraph are not directed at this answering
15 Defendant and therefore no response is required. To the extent a response is required, this
16 answering Defendant is without sufficient information to form a belief as to the truth of the
17 allegations and therefore denies them.

18 4.16 The allegations in the corresponding paragraph are not directed at this answering
19 Defendant and therefore no response is required. To the extent a response is required, this
20 answering Defendant is without sufficient information to form a belief as to the truth of the
21 allegations and therefore denies them.

22 4.17 The allegations in the corresponding paragraph are not directed at this answering
23 Defendant and therefore no response is required. To the extent a response is required, this
24 answering Defendant is without sufficient information to form a belief as to the truth of the
25 allegations and therefore denies them.

1 4.18 The allegations in the corresponding paragraph are not directed at this answering
2 Defendant and therefore no response is required. To the extent a response is required, this
3 answering Defendant is without sufficient information to form a belief as to the truth of the
4 allegations and therefore denies them.

5 4.19 Deny.

6 4.20 Deny.

7 4.21 Deny.

8 **V. DAMAGES**

9 5.1 This answering Defendant specifically denies wrongdoing of any kind and lacks
10 sufficient information to form a reasonable belief as to Plaintiff's alleged injuries; therefore,
11 this answering Defendant denies the allegations in the corresponding paragraph.

12 5.2 This answering Defendant specifically denies wrongdoing of any kind and lacks
13 sufficient information to form a reasonable belief as to Plaintiff's alleged injuries; therefore,
14 this answering Defendant denies the allegations in the corresponding paragraph.

15 5.3 This answering Defendant admits that Washington has the most significant
16 relationship to the alleged conduct underlying the negligence and products liability claims, but
17 denies any remaining allegations.

18 5.4 The allegations in the corresponding paragraph are not directed at this answering
19 Defendant and therefore no response is required. To the extent a response is required, this
20 answering Defendant is without sufficient information to form a belief as to the truth of the
21 allegations and therefore denies them.

22 5.5 Deny.

23 5.6 This answering Defendant specifically denies wrongdoing of any kind and lacks
24 sufficient information to form a reasonable belief as to Plaintiff's alleged injuries; therefore,
25 this answering Defendant denies the allegations in the corresponding paragraph.

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VI. PRAYER FOR RELIEF

BY WAY OF FURTHER ANSWER and in answer to Plaintiff's "Prayer for Relief," this answering Defendant denies that it acted unlawfully in any manner and further specifically denies that Plaintiff is entitled to any of the relief prayed for with respect to this answering Defendant.

AFFIRMATIVE DEFENSES

1. Failure to state a claim. The Complaint may not contain enough facts to state one or more causes of action against this answering Defendant.

2. Failure to mitigate damages. Plaintiff may have failed to take reasonable steps to minimize or prevent the damages Plaintiff claims to have suffered.

3. Comparative fault of third parties. People or entities other than this answering Defendant caused or contributed to the damages Plaintiff claims to have suffered. Therefore, any award made in favor of the Plaintiff in this case must be reduced by an amount equal to the percentage of the fault of others in causing or contributing to the damages as alleged in the complaint.

4. Apportionment of fault. Defendants other than this answering Defendant caused or contributed to the damages Plaintiff claims to have suffered. Therefore, any award made in favor of the Plaintiff in this case must be divided between the defendants so that each pays only his, her, or its fair share in relationship to his, her, or its amount of fault.

5. Sudden emergency.

RESERVATION OF RIGHTS

This answering Defendant expressly reserves the right to plead further answers, affirmative defenses, counterclaims, crossclaims, and third-party claims as investigation and discovery may warrant.

1 **PRAYER FOR RELIEF**

2 Defendant Ride the Ducks of Seattle, LLC prays for relief and judgment against Plaintiff
3 as follows:

4 (1) Dismissal of Plaintiff's claims with prejudice.

5 (2) All such other relief as is just and proper.

6
7 DATED this 2nd day of October, 2017.

8 PATTERSON BUCHANAN
9 FOBES & LEITCH, INC., P.S.

10 By: 

11 Patricia K. Buchanan, WSBA No. 19892
12 D. Jack Guthrie, WSBA No. 46404
13 Of Attorneys for Defendant Ride the Ducks of
14 Seattle, LLC
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