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 Date: _____
 Time: _____
 Judge/Calendar: _____

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
 IN AND FOR THE COUNTY OF THURSTON

LEGACY FOREST DEFENSE COALITION, a
 Washington non-profit corporation, and
 THURSTON COUNTY, WASHINGTON;

Appellants,

v.

WASHINGTON STATE DEPARTMENT OF
 NATURAL RESOURCES, BOARD OF
 NATURAL RESOURCES, and COMMISSIONER
 OF PUBLIC LANDS HILARY FRANZ, in her
 official capacity;

Respondents.

No.

**NOTICE OF APPEAL OF THE
 CARROT TIMBER SALE AND
 ASSOCIATED ENVIRONMENTAL
 REVIEW AND**

**COMPLAINT SEEKING
 DECLARATORY JUDGMENT**

I. SUMMARY

1. The Washington State Department of Natural Resources (“DNR”) is required under the terms and conditions of its 1997 State Lands Habitat Conservation Plan (“HCP”), and 2006 Policy for Sustainable Forests (“DNR Policy”), to develop a plan to restore "fully functional" or “old growth-like” forests across 10 to 15 percent of state forestlands, within each of six HCP planning units in Western Washington. DNR commonly refers to the 10 to 15 percent targets as the “Older Forest Targets.” In the Final Environmental Impact Statement that DNR prepared to approve the DNR Policy (“FEIS”), the Board of Natural Resources (“the Board”)

1 states in the “Board’s Preferred Alternative” that the “10-15 percent older-forest targets” are
2 expected to be accomplished within 70 to 100 years, and that once those targets are met,
3 “structurally complex forest stands that are not needed may be considered for harvest activities.”
4 FEIS at 3-177. The DNR Policy states that, “Once older-forest targets are met, structurally
5 complex forest stands that are not needed to meet the targets may be considered for harvest
6 activities.” DNR Policy at 47.

7 2. To achieve the Older Forest Targets, DNR established procedures for “Identifying
8 and Managing Structurally Complex Forests to Meet Older Forest Targets” (PR 14-004-046)
9 (hereinafter “DNR Procedures”). DNR Procedures require DNR to inventory structurally
10 complex forests in each HCP planning unit, and create a plan to protect and manage structurally
11 complex forests to meet the Older Forest Targets. Prior to development of a forest land plan,
12 DNR Procedures require, consistent with the DNR Policy, a landscape assessment to determine
13 if the HCP contains 10 to 15 percent structurally complex forest prioritized to meet older forest
14 targets. If yes, then DNR must designate and set aside the required 10 to 15 percent of structurally
15 complex forest, and anything above that designated amount may be considered for harvest
16 activities. If the landscape assessment shows less than 10 percent structurally complex forest
17 have been designated, then DNR must designate additional structurally complex forest to reach
18 at least 10 percent before such stands are available for timber harvest.

19 3. DNR has developed the “forest land plans” required by the HCP to achieve their
20 Older Forest Target in other planning units. However, it has not developed such a plan for the
21 South Coast HCP planning unit, which includes most of Capitol State Forest.

22 4. An analysis conducted by DNR in 2021 found that protected older forests
23 constitute less than one-quarter of one percent of the South Coast HCP planning unit, and that
24 protected, structurally complex forests that are excluded from commercial timber harvest
25 constitute only one percent of the planning unit.

1 5. On January 3, 2024, the Washington Board of Natural Resources (“Board”)
2 authorized the Carrot Timber Sale, No. 30-103584, SEPA File No. 23-080802 (the “Carrot
3 Project”), allowing DNR to auction 73 acres of publicly owned timber in the South Coast HCP
4 planning unit to a private timber company.

5 6. The Board approved the Carrot Project after DNR determined that it would not
6 have a “probable significant adverse impact on the environment” and issued a threshold
7 Determination of Nonsignificance (“DNS”) under the State Environmental Policy Act (“SEPA”),
8 chapter 43.21C RCW.

9 7. The Carrot Project would allow loggers to clearcut approximately 73 acres of rare,
10 naturally regenerated, 90-100 year-old, low-elevation forest in the Waddell and Cedar Creek
11 watersheds of Capitol State Forest, including trees that are over four feet in diameter and close
12 to 200 feet tall. These acres qualify as “structurally complex forests” under DNR standards and
13 policies—diverse stands with multiple canopies and plant communities, and trees of various
14 diameters and heights. Designating them as such could help DNR meet its Older Forest Target
15 for the South Coast HCP planning unit.

16 8. In reaching its DNS for the Carrot Project, and then approving the Carrot Project
17 for auction, DNR and the Board did not account for the adverse direct, indirect, and cumulative
18 impacts of the Carrot Project. First, DNR failed to consider the direct and indirect impacts of the
19 Carrot Project, identified by Appellant LFDC, including: violations of DNR Policy and DNR
20 Procedures; harm to protected wildlife and plant species, loss of habitat, and the loss of
21 biodiversity in the South Coast HCP—some of which are identified in LFDC’s October 6, 2023,
22 and January 2, 2024, comment letters—that are required to be protected under those procedures;
23 the loss of ecosystem services that the biodiversity of structurally complex forest in the HCP
24 provides; and the loss of recreation, scenic views, and other public uses by LFDC’s members and
25 Thurston County citizens. Second, DNR failed to address the cumulative impacts of the Carrot
26 Project in context of other potential timber sales, some of which are listed in Paragraph 60 below.

1 **III. PARTIES**

2 16. Appellant the Legacy Forest Defense Coalition (“LFDC”) is a Washington State-
3 registered 501(c)(3) non-profit organization based in Tacoma, Washington. LFDC seeks to
4 promote a balanced approach to the management of Washington state forestlands that allows
5 DNR to generate reliable revenue for trust beneficiaries, while preserving and accelerating the
6 development of older forests, as required under the terms and conditions of the HCP,
7 DNR Policy, and DNR Procedures. LFDC’s mission is to preserve the genetic, biological, and
8 ecological legacies of the native forests that once dominated Western Washington for the benefit
9 of all people, and its members have a particular interest in ensuring that the state’s forests are
10 managed in a responsible and lawful manner.

11 17. LFDC’s members regularly visit and recreate in DNR-managed forestlands,
12 including those in Capitol State Forest. LFDC’s members gain aesthetic enjoyment from visiting
13 older forests and observing the wildlife that inhabits these forests. LFDC’s members have visited
14 the Carrot Project area in the past and have plans to do so again in the future. Their enjoyment of
15 the area will be diminished if the logging approved by the Carrot Project goes forward, and the
16 structurally complex forests in that region are degraded or destroyed. Those same interests will
17 be protected if the Court issues injunctive relief to prevent the Carrot Project area from
18 being logged.

19 18. Appellant Thurston County is a Washington State municipal corporation. The
20 County is a trustee and beneficiary of parcels managed by DNR within the Carrot Project area.
21 The County is currently engaged in discussions with DNR to explore management tools that may
22 better reflect “shared values” on trust lands within the County, including those that are part of
23 the Carrot Project area. On December 18, 2023, DNR invited further discussion to consider tools
24 that may reposition lands within the County, such as reconveyance, direct transfer, and Trust
25 Land Transfer. If the Carrot Project moves forward as planned, it would frustrate the County’s
26 efforts to ensure its citizen goals are met, including consideration of climate impacts and

1 mitigation, recreation, forest resiliency, wildlife, protection of private land, and other values
2 directly and indirectly affected by timber production on County trust lands.

3 19. The defendant DNR is an agency of the state of Washington and is responsible
4 for managing forests on Washington state trust lands.

5 20. The Board of Natural Resources (“Board”) sets policies that guide how DNR
6 manages state trust lands. Its powers and duties include appraisal and approval of timber sales
7 on state forestlands prior to auction. The Board must review and approve timber sales on state
8 trust land before those sales are presented for auction.

9 21. The Commissioner of Public Lands (“Commissioner”) Hilary Franz has a seat on
10 the Board and is the administrator for DNR, with jurisdiction over all the powers, duties, and
11 functions of DNR, except those specifically assigned to the Board.

12 22. DNR’s Forest Resources Division manages state trust lands (“DNR State Lands”),
13 and the Forest Practices Division (“DNR Regulatory”) reviews forest practices applications.
14 DNR State Lands develops potential timber sales and submits them to DNR Regulatory for
15 review and ultimate approval.

16 23. Unless otherwise specified, as used herein “DNR” refers to the Board, DNR, and
17 Commissioner of Public Lands collectively.

18 **IV. LEGAL BACKGROUND**

19 24. The Public Lands Act authorizes and governs DNR’s management of public
20 lands, including land suitable for state forests that the state has acquired in various ways, such as
21 land ceded by the federal government for the state to manage. These lands are known as the
22 “state lands” and the “state forestlands.” RCW 79.02.010(14) and 79.02.010(15). DNR is
23 authorized to prepare and auction timber sales to generate revenue for trust beneficiaries on a
24 sustained yield basis. RCW 79.10.320. DNR State Lands administers the Public Lands Act.

25 25. SEPA imposes both substantive and procedural obligations on DNR’s
26 management of public lands.

1 26. The purposes of SEPA are: (1) to declare a state policy which will encourage
2 productive and enjoyable harmony between humankind and the environment; (2) to promote
3 efforts which will prevent or eliminate damage to the environment and biosphere; (3) to stimulate
4 the health and welfare of human beings; and (4) to enrich the understanding of the ecological
5 systems and natural resources important to the state and nation. RCW 43.21C.010. SEPA is
6 designed to provide decision makers and the public with full information about the potential
7 adverse environmental impacts of a proposed action, and to ensure that decisions are made after
8 thorough scientific analysis, consideration of expert comments, and public scrutiny.

9 27. Under SEPA, an agency must consider environmental information—including
10 impacts, alternatives, and mitigation--before committing to a particular course of action.
11 WAC 197-11-055(2)(c). SEPA requires an agency to consider all environmental and ecological
12 factors to the fullest extent when taking major actions significantly affecting the environment.
13 When describing the environmental impacts, an agency must consider direct, indirect, and
14 cumulative impacts.

15 28. SEPA requires DNR to prepare an Environmental Checklist for each timber sale
16 (“SEPA Checklist”) so it can conduct a threshold analysis to determine if that sale will have a
17 “probable significant, adverse environmental impact.” RCW 43.21C.031. An environmental
18 impact is considered to be “significant” if there is a reasonable likelihood that it will have more
19 than a moderate adverse impact on environmental quality. WAC 197-11-794. A “significance”
20 determination “involves context and intensity” and “the context may vary with the setting.”
21 WAC 197-11-794. If an agency makes a determination of significance, it must prepare an
22 environmental impact statement that includes analysis of reasonable alternatives that achieve
23 similar goals with less environmental impact. Environmental impacts include factors such as
24 impacts to fish and wildlife, plants and animals, surface water quality and runoff, aesthetics,
25 recreation, and parks. WAC 197-11-752; WAC 197-11-444.

1 HCP implementation procedures, the DNR Policy constitutes DNR’s plan for implementing the
2 HCP. As DNR states in the SEPA Checklist for the Carrot Project, compliance with the HCP
3 implementation procedures “substantially helps the Department to mitigate for cumulative
4 effects” of specific timber sales.

5 34. The DNR Policy identifies the preservation of biodiversity as a “fundamental
6 guiding principle for sustainable forest management.” It directs DNR to protect wildlife species
7 and habitats by working to conserve “upland, riparian, and aquatic wildlife species, including
8 fish and their habitats, species listed as threatened and endangered, and non-listed species . . .
9 with a focus on ecosystem sustainability and the conservation of biodiversity across forested
10 landscapes.”

11 35. A core requirement of the multispecies conservation strategy of the HCP is to
12 identify, protect, and restore 10 to 15 percent of forests within each HCP planning unit to the
13 most structurally complex stage of stand development (called the “fully functional stage”) within
14 100 years. The HCP suggests that a minimum of 150 years is required for a forest to reach the
15 fully functional stage of development.

16 36. DNR’s own analysis indicates that forests over 150 years old currently constitute
17 just one-tenth of one percent of the South Coast HCP planning unit. The agency is thus woefully
18 short of meeting its requirement to develop fully functional forests in the South Coast HCP
19 planning unit.

20 37. One of the intended outcomes of the DNR Policy is to “meet a 10 to 15 percent
21 Older Forest Target for each Western Washington HCP planning unit” within 70 to 100 years.
22 In the FEIS, the Board’s selected alternative “emphasizes that the 10 to 15 percent Older Forest
23 Targets will be accomplished” within 70 to 100 years—which is equivalent to the term of
24 the HCP.

25 38. Under the DNR Policy, DNR is required to “actively manage structurally complex
26 forests, especially those suitable stands in the botanically diverse stage of stand development, to

1 achieve older-forest structures across 10 to 15 percent of each Western Washington HCP
2 planning unit in 70-100 years.”

3 39. DNR defines botanically diverse stands as those in which “multiple canopies of
4 trees and communities of forest floor plants are evident” and “large and small trees have a variety
5 of diameters and heights.”

6 40. The Carrot Project contains stands in the botanically diverse stage of stand
7 development. These stands have the potential to help DNR meet its Older Forest Target in the
8 South Coast HCP planning unit. The Carrot Project authorizes the logging of these stands.

9 41. The DNR Policy requires DNR to identify suitable structurally complex forest
10 stands to be managed to help meet its Older Forest Target. It dictates that “[o]nce Older Forest
11 Targets are met, structurally complex forest stands that are not needed to meet the targets may
12 be considered for harvest activities.” Under the DNR Policy, DNR may not authorize logging of
13 structurally complex forests in a planning unit until the 10 to 15 percent older forest objectives
14 are met in that planning unit.

15 42. The DNR Procedures dictate that “the identification and review of landscape level
16 management strategies to achieve the 10 to 15 percent Older Forest Target will be completed
17 during the forest land planning process that will be conducted for each HCP planning unit.”

18 43. DNR has completed forest land plans for other HCP planning units but has not
19 completed a plan for the South Coast HCP planning unit within which the Carrot Project
20 is located.

21 44. DNR procedures require that until a forest land plan is completed, any proposed
22 harvest activities in areas that are considered structurally complex forests “must be accompanied
23 by the following information: (a) an assessment of forest conditions using readily available
24 information, (b) an analysis of the known landscape management strategies and, (c) role of the
25 structurally complex stand in meeting Older Forest Targets.” DNR Procedures further require
26

1 that the information DNR gathers to satisfy these requirements “be included in the [SEPA]
2 checklist for the proposed harvest activity for public review.”

3 45. DNR did not include any of this information in the SEPA Checklist for the
4 Carrot Project.

5 46. DNR Procedures require DNR to designate and set aside structurally complex
6 forests across at least 10 percent of the HCP planning unit before it can make unneeded
7 structurally complex forests available for harvest.

8 47. Data obtained from DNR’s Public Disclosure Office indicates that DNR has set
9 aside only 2,631 acres of structurally complex forests in the South Coast HCP planning unit for
10 conservation. This represents just one percent of the South Coast HCP planning unit. DNR has
11 not met its 10 percent minimum requirement under the DNR Procedures to harvest any
12 structurally complex forest in the HCP.

13 48. DNR failed to comply with DNR Procedures by authorizing logging of
14 structurally complex forests in the Carrot Project.

15 49. DNR did not make any attempt, through its SEPA threshold determination or
16 elsewhere, to assess whether the Carrot Project complies with DNR Procedures. DNR did not
17 complete the assessments and analyses required by the DNR Procedures for the Carrot Project.

18 50. DNR never acknowledged or explained its failure to comply with from the
19 DNR Procedures.

20 51. DNR continues to authorize logging of some of the most biologically diverse and
21 structurally complex forests in the South Coast HCP planning unit based on the assumption that
22 stream buffers and other protected forestlands will provide the required 10 to 15 percent older
23 forests within 70 to 100 years. DNR's own calculations contradict this assumption. Even if true,
24 this assumption does not excuse or remedy the violations of the HCP, DNR Policy, and
25 DNR Procedures.
26

1 52. In preparation for potential approval of the Carrot Project, DNR conducted a
2 SEPA threshold review and issued a DNS on August 8, 2023.

3 53. Appellant LFDC submitted public comments in response to the DNS on
4 October 6, 2023, raising significant concerns regarding DNR's ability to meet its Older Forest
5 Target in the South Coast HCP planning unit.

6 54. DNR issued a "Notice of Final Determination" retaining the DNS on
7 October 12, 2023.

8 55. On October 12, 2023, Appellant LFDC received a letter from Don Melton, DNR's
9 Acting South Puget Sound Region Manager.

10 56. Mr. Melton's letter fails to provide any information or data, or references to any
11 reports, studies, or assessments that refute the facts as set forth above.

12 57. Appellant LFDC submitted additional comments, and photographs of the Carrot
13 timber sale, to the Board of Natural Resources on January 2, 2024, to support the conclusion,
14 documented in its original October 6, 2023 comment letter, that the Carrot Project ignored
15 established Board policies and procedures.

16 58. Nevertheless, the Board approved the Carrot Project for auction on
17 January 3, 2023. The Board is legally required to review and approve sale appraisals before DNR
18 presents the sale for auction. *See* RCW 43.30.215; RCW 79.15.060.

19 59. If logging goes forward under the project, approximately 73 acres of structurally
20 complex forest capable of contributing to the Older Forest Target will be logged. DNR failed to
21 consider those impacts, failed to consider the impacts of failing to comply with applicable
22 requirements, policies, and procedures, and incorrectly concluded they would be mitigated
23 through compliance with the HCP.

24 60. DNR is planning many additional timber sales in close proximity to the
25 Carrot Project over the next six years, including the "Lizard Lounge," "Sparrow Hawk,"
26 "Class Dismissed," "Mr. Mint," "Sunny," "Ghost," "Rad Aghast," "Honey," "Comb,"

1 “Nuggets,” “Evergreen Gold,” “Lions Main,” “Hornet,” “Misty,” “Gremlin,” “Mild Bill,”
2 “Twisted Top,” and “Biscuits” timber sales, which would clearcut other structurally complex
3 forests capable of contributing to the Older Forest Target in the South Coast HCP planning unit.
4 These timber sales will have a significant cumulative effect on DNR’s ability to meet its Older
5 Forest Target within 70 to 100 years.

6 61. The SEPA Checklist for the Carrot Project did not take into account the
7 cumulative effect of the project along with other past and planned future projects in the area.

8 62. The Public Lands Act requires DNR to make a finding that a timber sale is “in the
9 best interests of the state” prior to offering it for sale. Neither DNR, the Commissioner of Public
10 Lands, nor the Board made a published finding that the Carrot Project is in the best interests of
11 the state.

12 63. The sale is not in the best interests of the state and would undermine DNR’s
13 commitment to meet its Older Forest Target in the South Coast HCP planning unit.

14 VI. CLAIMS

15 Claim One— The Public Lands Act, RCW 79.02.030

16 64. Appellants incorporate by reference all preceding paragraphs.

17 65. The decision by DNR, the Board, and the Commissioner to approve the Carrot
18 Project are appealable under the Public Lands Act, RCW 79.02.030, as an “order or decision of
19 the board, or the commissioner” concerning the sale of valuable materials from state lands.

20 66. DNR, the Board, and the Commissioner violated the Public Lands Act by acting
21 arbitrarily and capriciously in approving the Carrot Project for auction based on incomplete and
22 inaccurate information, failing to comply with the HCP, the DNR Policy, and DNR Procedures,
23 without rationale, and ignoring the impact that the project would have on DNR’s management
24 objectives.

25 67. DNR did not provide any information or data to support its departure from the
26 HCP, DNR Policy, and DNR Procedures.

1 68. DNR, the Board, and the Commissioner violated the Public Lands Act by
2 approving the Carrot Project without making a finding that the sale is in the best interests of
3 the state.

4 **Claim Two—State Environmental Policy Act, RCW 43.21C.075**

5 69. Appellants incorporate by reference all preceding paragraphs.

6 70. DNR, the Board, and the Commissioner violated SEPA by approving the Carrot
7 Project based upon a clearly erroneous DNS.

8 71. DNR conducted a SEPA threshold evaluation that terminated SEPA review,
9 which was based on incomplete information because it failed to evaluate the extent to which the
10 Carrot Project would impact DNR’s ability to meet its Older Forest Target, failed to consider
11 conflicts with the HCP, DNR Policy, and DNR Procedures, and failed to take into account the
12 direct, indirect, and cumulative impacts of the project.

13 72. DNR’s SEPA evaluation failed to assess forest conditions in compliance with the
14 HCP, DNR Policy, and DNR Procedures.

15 73. DNR failed to base its threshold determination on information that accurately
16 reflected its ability to meet its own policy objectives and failed to resolve uncertainties by
17 conducting further study or performing further environmental review. *See* WAC 197-11-335.

18 74. DNR did not withdraw its DNS and prepare an environmental impact statement
19 despite significant information indicating the proposal’s probable significant adverse
20 environmental impacts. *See* WAC 197-11-340(3)(a)(ii).

21 75. DNR, the Board, and the Commissioner failed to carry out their responsibilities
22 under SEPA. RCW 43.21C.020.

23 **Claim Three – Uniform Declaratory Judgments Act, RCW 7.24.010, et seq.**

24 76. Appellants incorporate by reference all preceding paragraphs.

1 77. DNR takes the legal position that it may continue to log structurally complex
2 forests based on a different interpretation of its obligations under the HCP, DNR Policy, and
3 DNR Procedures. This creates a regular, ongoing, discrete conflict between Appellants and DNR.

4 78. To avoid yet another case that could potentially be mooted by timber harvest and
5 to provide DNR and the Board of Natural Resource essential guidance on this issue, it is
6 necessary and essential that the court decide this issue in a Declaratory Judgment so that DNR
7 does not continue to misapply the laws by which it is bound. The identical “older forest” legal
8 issue in this case was recently litigated in *Center for Responsible Forestry v. DNR*, Court of
9 Appeals No. 56964-7-II (Unpublished opinion, decided September 26, 2023). While that court
10 ultimately dismissed the appeal as moot, because the forest was logged during the pendency of
11 the appeal, and the court declined to invoke the public interest exception to the mootness doctrine,
12 on page 10 of the court’s slip opinion the court acknowledged the Center’s representation that
13 the older forest legal issue in that case would likely repeat itself in at least 69 future cases. This
14 is precisely the case here: while the precise number of future cases is not known today, this issue
15 will arise in dozens of future cases in the South Coast HCP planning unit. The Jefferson County
16 Superior Court has granted LFDC a preliminary injunction to address the same issue in *Legacy*
17 *Forest Defense Coalition v. DNR*, No. 23-2-00251-16 (Dkt. 31 January 22, 2024), related to the
18 Last Crocker Sorts timber sale.

19 79. Members of Appellant LFDC, and citizens in Thurston County live near and
20 regularly visit DNR-managed public lands in western Washington, and will continue to do so.
21 The logging that DNR carries out pursuant to its legal position regarding structurally complex
22 forests causes ongoing harm and threat of harm to Appellants, members of Appellant
23 organizations, and citizens served by Appellant Thurston County, both on a site-specific scale of
24 described forest management, as well as on the larger scale of cumulative harm to biodiversity,
25 forest health and function, and other environmental attributes of structurally complex forests.

1 8. Any other relief that this Court deems just and proper.

2 DATED this 1st day of February, 2024.

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Thurston County Clerks eFile - Status Confirmation

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