

Hon. Jason Poydras
Noted for Hearing:

Friday, February 14, 2025, 10:00 a.m.

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR KING COUNTY

GRE DOWNTOWNER LLC, a Washington
limited liability company, d/b/a ADDISON ON
FOURTH,

Plaintiff,

v.

CITY OF SEATTLE,

Defendant.

No. 24-2-24318-6 SEA

**ERRATA TO DEFENDANT CITY OF
SEATTLE’S MOTION TO DISMISS**

Defendant City of Seattle filed a Motion to Dismiss on Friday, January 17, 2025.

Footnote 7 on page 17 cites authority inaccurately. The text of footnote 17, as corrected, should read:

Although the district court in *Gallo* later granted a motion for reconsideration and allowed the plaintiff to file an amended complaint to clarify facts, the court reaffirmed that *Cedar Point* did not control and dismissed the case for failure to state a claim. *Gallo*, No. 1:21-cv-03298 (TNM), 2023 WL 2301961, *3 (D.D.C. March 1, 2023). *Gallo v. District of Columbia*, 659 F. Supp. 3d 21, 24 (D.D.C. 2023). The court later dismissed the case for failure to state a claim. *Gallo v. District of Columbia*, No. 1:21-cv-03298 (TNM), 2023 WL 7552703 (Nov. 14, 2023), appeal filed No. 23-7158 (D.C. Cir. Nov. 22, 2023).

We certify that, as corrected, MS Word calculates that all portions of the Motion required by the Local Civil Rules to be counted contain 8,257 words, which complies with the Local Civil Rules.

1 Respectfully submitted January 22, 2024.

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1 **CERTIFICATE OF SERVICE**

2 I certify that on this date, I electronically filed a copy of the following document:

3 Errata to Defendant City of Seattle’s Motion to Dismiss

4 with the Clerk of the Court using the KC Scripts Portal, which will send notification of the filing
5 to the following:

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16 *Attorneys for Plaintiff GRE Downtowner LLC.*

17 I further certify that, on this date, I sent a copy of the same document by email pursuant to an
18 agreement under CR 5(b)(7) to the above-named attorneys for Plaintiff GRE Downtowner LLC
19 and:

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DATED this 22nd day of January, 2025, at Seattle, Washington.

s/Eric Nygren
ERIC NYGREN, Legal Assistant