No. 19-291

In The

Supreme Court of the United States

ANNE BLOCK,

Petitioner,

v.

WSBA, et al.,

Respondents.

On Petition For Writ Of Certiorari
To The United States District Court Of Appeals For The Ninth Circuit

REPLY TO RESPONDENT KENYON DISEND AND CITY OF GOLD BAR'S OPPOSITION TO PETITION FOR WRIT OF CERTIORARI

ANNE BLOCK

115 West Main St #204 Monroe, WA 98272 (206) 326-9933



TABLE OF CONTENTS

INTRODUCTION	4
THE RESPONDENTS INTRODUCTION	4
I. FACTS RELEVANT TO THE PETITION	4
(A) Procedural Facts:	4
(B) Substantive facts:	5
II. REPLY ARGUMENTS	5
A. All three judges associated in this case have	
pre-existing conflicts of interest which require their	r
disqualification.	5
B. The plaintiff has properly pled first	
amendment retaliation claims.	7
C. The Bar's actions of retaliating for asserting	
her right to disassociate from the Bar violated her	
constitutional right to disassociate from	
organizations she disagrees with	.10
CONCLUSION	.11



TABLE OF AUTHORITIES

Cases
Acosta Huerta v. Estelle, 7 F.3d 139, 144 (9th Cir.
1992) 7
Allapattah Services Inc. v. Exxon Corp., 362 F.3d 739
(11th Cir. 2004)9
Arizona Students' Ass'n v. Arizona Bd. of Regents,
824 F.3d 858, 867 (9th Cir. 2016)9
Arrington v. Dickerson, 915 F. Supp. 1516 8, 9
Baird v. State Bar of Ariz., 401 U.S. 1, 7 (1971) 10
Bd. of Cty. Comm'rs v. Umbehr, 518 U.S. 668, 674
(1996)
Buckley v. Valeo, 424 U.S. 1, 14 (1976) 10
Greenwood v. FAA, 28 F.3d 971, 977 (9th Cir. 1994).7
Harris v. Quinn, 134 S.Ct. 261811
Janus v. American Federation of State, County, and
Municipal Employees, Council 31, No. 16-1466, 585
U.S (2018)
Keller v. State Bar of California 496 U.S. 1, 4 (1990)
11
Knox v. Service Emps. Int'l Union, Local 1000
("SEIU"), 132 S. Ct. 2277 (2012)11
Lathrop v. Donohue, 367 U.S. 820, 843 (1961) 11
Meehan v. County of L.A., 856 F.2d 102, 105 n.1 (9th
Cir. 1988)
New York Times Co. v. Sullivan, 376 U.S. 254 (1964)
Plechner v. Widener College, Inc., 569 F.2d 1250,
1262 n. 7 (3d Cir.1977)
Republic of Kazakhstan v. Does 1-100, 192 Wn. App.
7739



Roth v. United States 354 U.S. 476, 484 (1957) State v. Young, 89 Wn.2d 613, 625, 574 P.2d 1171 (1978)	L
Other Authorities	
Goodrichamram 2d, Standard Pennsylvania	7
Practice § 2158.1 (1977)	/
Rules	_
Pa. R. Civ. P. 2158	6
Supreme Court rule 10	8

INTRODUCTION

Respondents' assert to this Court that there is nothing unique or unusual about a news reporter being disbarred for reporting and publishing on public officials' corruption. They see nothing wrong with the bar association issuing a subpoena demanding Ms. Block to divulge confidential sources, turner over reporter files not related to a client, when RCW 5.68.010 (Media Shield), the First Amendment, and the Washington Constitution prohibits such infringement of citizen's rights. They offer no explanation as to how their thinly disguised attempt at censor and punish a member of the press and free speech of lawyers has anything to do with the practice of law.

This case is unique because it involves for the first time in United States history when a news reporter, who happened to be a licensed attorney, is disbarred because of she writes about public officials corrupt acts in a publication. If allow to stand, years of case law are virtually overturned simply because Ms. Block was a lawyer who chose to investigate and report on corruption inside Washington State agencies. Every American's precious constitutional right to freedom of speech and freedom of the press suffers when government officials punish lawful First Amendment activity.

The court should take notice that some of the



DOCKET

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

