## Carey, Deborah

## **COURSE OF EMPLOYMENT (RCW 51.08.013; RCW 51.08.180(1))**

Parking area exclusion (RCW 51.08.013)

A worker is acting in the furtherance of the employer's business when required to park in an employer-designated parking lot, subject to disciplinary action for non-compliance, and the employer's directive was issued in furtherance of its business interests. A worker injured in a parking lot, under such circumstances, is acting in the course of employment and the parking area exclusion of RCW 51.08.013 does not apply. ....In re Deborah Carey, BIIA Dec., 03 13166 (2004) [Editor's Note: Division III Court of Appeals declined to follow in Simonson v. Department of Labor & Indus., No 38737-2-III (2023) (Unpublished).]

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