

IN THE SUPREME COURT FOR THE STATE OF WASHINGTON

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STATE OF WASHINGTON,)	No. 92367-1
Petitioner,)	
)	
)	STATEMENT OF
v.)	ADDITIONAL
)	AUTHORITIES
FRANK G. LAZCANO,)	(RAP 10.8)
Respondent.)	

Pursuant to RAP 10.8, Frank G. Lazcano, submits the following statement of additional authorities regarding the essential legal requirements of collateral estoppel:

In re Pers. Restraint of Moi, _ Wn.2d _, _ P.3d __, 2015 WL 6549160, *5 n.4 (Oct. 29. 2015) (noting that collateral estoppel test from other jurisdictions, including federal decisions, “does not require the court to consider whether application of the doctrine will work an injustice” and instead asks: were the issues in the two actions sufficiently similar and material; was the issue litigated in the first case; and was the issue necessarily decided in the first case).

DATED this 19th day of November 2015.

Respectfully submitted,



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