

SUPREME COURT
OF THE STATE OF WASHINGTON

KARY L. CALDWELL,

Appellant,

vs.

CITY OF HOQUIAM, a
governmental entity,

Respondent,

and

GRAYS HARBOR COUNTY, a
governmental entity; JENNIFER M.
SMITH and JOHN DOE SMITH,
individually and the marital
community composed thereof;
SHAWN M. SMITH and JOHN DOE
SMITH, individually and the marital
community composed thereof;
JAMES THOMPSON and JANE
DOE THOMPSON, individually and
the marital community composed
thereof,

Defendants.

No. 93265-4

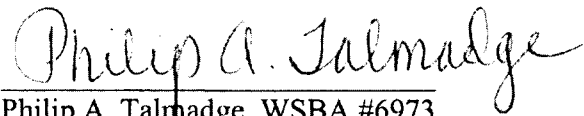
STATEMENT OF
ADDITIONAL
AUTHORITY

COMES NOW appellant Kary Caldwell and submits the following
additional authority to the Court pursuant to RAP 10.8:

- *Oliver v. Cook*, ___ Wn. App. ___, ___ P.3d ___, 2016 WL 3264362 (2016) (court addresses failure to enforce exception to public duty doctrine in pit bull attack case; court also recognizes viability of common law negligence claims in dog attack context).

DATED this 17th day of June, 2016.

Respectfully submitted,



Philip A. Talmadge, WSBA #6973
Talmadge/Fitzpatrick/Tribe
2775 Harbor Avenue SW
Third Floor, Suite C
Seattle, WA 98126
(206) 574-6661

Christopher M. Davis, WSBA #23234
Gregory S. Colburn, WSBA #41236
Davis Law Group, P.S.
2101 Fourth Ave., Suite 1030
Seattle, WA 98121
(206) 727-4000
Attorneys for Appellant
Kary Caldwell

DECLARATION OF SERVICE

On said day below I electronically served a true and accurate copy of the Statement of Additional Authority in Supreme Court Case No. 93265-4 to the following parties:

John R. Nicholson
Gregory E. Jackson
Michael E. Tardif
Freimund Jackson & Tardif, PLLC
711 Capitol Way South, Suite 602
Olympia, WA 98501
john@fjtlaw.com
gregj@fjtlaw.com
miket@fjtlaw.com

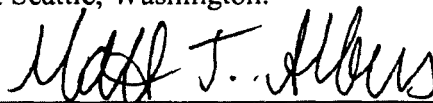
Christopher M. Davis
Gregory S. Colburn
Davis Law Group, P.S.
2101 Fourth Avenue, Suite 1030
Seattle, WA 98121-2317
chris@injurytriallawyer.com
greg@injurytriallawyer.com

John Edward Justice
Law Lyman Daniel Kamerrer, et al.
PO Box 11880
Olympia, WA 98508-1880
jjustice@lldkb.com

Original e-filed with:
Washington Supreme Court
Clerk's Office

I declare under penalty of perjury under the laws of the State of Washington and the United States that the foregoing is true and correct.

Dated: June 17, 2016 at Seattle, Washington.



Matt J. Albers, Paralegal
Talmadge/Fitzpatrick/Tribe

TALMADGE/FITZPATRICK/TRIBE

June 17, 2016 - 2:26 PM

Confirmation of Filing

Filed with Court: Supreme Court
Appellate Court Case Number: 93265-4
Appellate Court Case Title: Kary L. Caldwell v. City of Hoquiam

The following documents have been uploaded:

- 932654_20160617142405SC158841_1340_Other.pdf
This File Contains:
Other - Statement of Additional Authority
The Original File Name was Statement of Additional Authority.pdf

A copy of the uploaded files will be sent to:

- miket@fjtlaw.com
- phil@tal-fitzlaw.com
- greg@injurytriallawyer.com
- chris@davislawgroupseattle.com
- gregj@fjtlaw.com
- jjustice@lldkb.com
- johnn@fjtlaw.com
- rory@davislawgroupseattle.com
- kathief@fjtlaw.com
- Frand@fjtlaw.com
- KathrineS@fjtlaw.com
- Kristyj@fjtlaw.com
- matt@tal-fitzlaw.com

Comments:

Sender Name: Matt Albers - Email: matt@tal-fitzlaw.com

Filing on Behalf of: Philip Albert Talmadge - Email: phil@tal-fitzlaw.com (Alternate Email: matt@tal-fitzlaw.com)

Address:

2775 Harbor Avenue SW
Third Floor Ste C
Seattle, WA, 98126
Phone: (206) 574-6661

Note: The Filing Id is 20160617142405SC158841