

FILED
SUPREME COURT
STATE OF WASHINGTON
3/25/2020 2:49 PM
BY SUSAN L. CARLSON
CLERK

No. 98073-0

IN THE SUPREME COURT OF
THE STATE OF WASHINGTON

STATE OF WASHINGTON,

Respondent,

v.

JOHN ALLEN BOOTH JR.,

Petitioner.

MOTION TO FILE AMENDED [SUPPLEMENTAL] PETITION FOR
REVIEW

PETER B. TILLER - WSBA NO. 20835
Of Attorneys for John Booth

THE TILLER LAW FIRM
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IN THE SUPREME COURT OF
THE STATE OF WASHINGTON

STATE OF WASHINGTON :

Respondent

JOHN ALLEN BOOTH JR.,

Petitioner

SUPREME COURT NO.
98073-0

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PETITION FOR REVIEW

A. IDENTITY OF MOVING PARTY

The moving party, John Booth, petitioner herein, by and through his attorney of record, Peter B. Tiller, of asks for the relief designated in Part 2 of this Motion.

B. STATEMENT OF RELIEF SOUGHT

The moving party seeks leave to file an amended Petition for Review, in order to add an additional issue for review. Petitioner filed a timely Petition for Discretionary Review on January 10, 2020. The State filed a Response on February 10, 2020, 2020. Mr. Booth filed a pro se Answer to State's Response on March 4, 2020, which was rejected for filing on March 5, 2020. Mr. Booth's counsel now submits the attached Amended Petition for Review and requests that the Amended Petition be

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accepted for filing.

C. GROUNDS FOR RELIEF AND ARGUMENT.

1. **THE SUPREME COURT SHOULD ALLOW PETITIONER TO FILE AN AMENDED PETITION FOR REVIEW IN ORDER TO PRESENT AN ADDITIONAL ARGUMENT NOT INCLUDED IN HIS ORIGINAL PETITION**

Mr. Booth submits that the additional issue contained in the Amended Petition for Review should be considered by the Court in the interests of justice so that all issues booth considers meritorious may be considered by the Court. The Amended Petition for Review is intended to be considered for review along with the previously-filed Petition for Review, and not in the place of the former. Mr. Booth request the two issues contained in the original Petition for Review to be considered along with the additional issue contained in the Amended Petition. For clarity, Mr. Booth has numbered his additional argument as the third issue to be considered.

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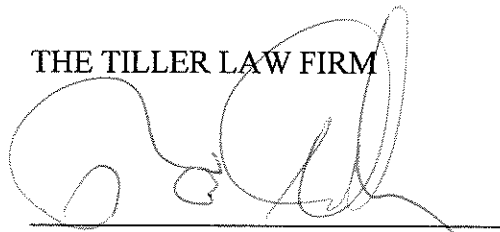
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F. CONCLUSION

Based on the arguments, records and files contained herein, the Petitioner respectfully requests his Amended [Supplemental] Petition be accepted for review in conjunction with the previously filed Petition for Review.

Dated: March 25, 2020.

THE TILLER LAW FIRM

A handwritten signature in black ink, appearing to read 'Peter B. Tiller', is written over a horizontal line.

PETER B. TILLER - WSBA #20835
Attorney for Petitioner

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CERTIFICATE OF SERVICE

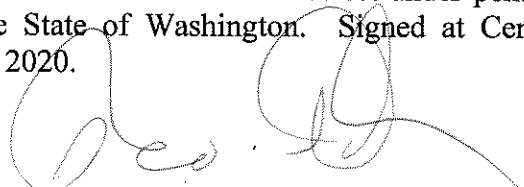
The undersigned certifies that on March 25, 2020, that this Motion to File to Amended Petition for Review was sent by the JIS link to Mr. Derek M. Byrne, Division II, 950 Broadway Ste. 300, Tacoma, WA 98402-4454 and copies were mailed by U.S. mail, postage prepaid, to the following:

Ms. Sara Beigh
Lewis County Prosecutors Office
345 W Main St. Fl 2
Chehalis, WA 98532-4802
appeals@lewiscountywa.gov

Mr. Derek M. Byrne
Clerk of the Court
Court of Appeals
950 Broadway, Ste.300
Tacoma, WA 98402-4454

Mr. John Allen Booth Jr.
DOC# 779999
Monroe Correctional Complex
PO Box 777
Monroe, WA 98272
LEGAL MAIL/SPECIAL MAIL

This statement is certified to be true and correct under penalty of perjury of the laws of the State of Washington. Signed at Centralia, Washington on March 25, 2020.



PETER B. TILLER

THE TILLER LAW FIRM

March 25, 2020 - 2:49 PM

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: 98073-0
Appellate Court Case Title: State of Washington v. John Allen Booth Jr.
Superior Court Case Number: 96-8-00501-1

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Other - Amended [Supplemental] Petition for Review
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