

FILED  
SUPREME COURT  
STATE OF WASHINGTON  
7/30/2021 12:10 PM  
BY ERIN L. LENNON  
CLERK

No. 99672-5

**SUPREME COURT OF WASHINGTON STATE**

KMP, a minor child, by and  
through her natural mother and  
custodial parent,

SARAH HALL PINHO,

Respondent,

v.

BIG BROTHERS BIG SISTERS  
OF PUGET SOUND, and  
MICHAEL WAYNE SANCHEZ,

Petitioner.

AMICUS'S SECOND  
R.A.P. 10.8  
STATEMENT  
OF ADDITIONAL  
AUTHORITIES

**AMICUS'S SECOND R.A.P. 10.8 STATEMENT  
OF ADDITIONAL AUTHORITIES**

**Pursuant to RAP 10.8, Amicus submits this 2<sup>ND</sup>  
statement of additional authorities (prior to the week of  
court's Division hearings):**

Issue #1.

On the methodology of segregating SLAPP attorney fees, the limits of court's discretion, the "Lodestar" method, the nature of the nexus being either temporal triggers or causation or "but for" causation, juxtaposed with this court's having struck .525 from 4.24.510.

*Loeffelholz v. C.L.E.A.N.*, 119 Wn. App. 665 at 690 (2004)

Issue #2.

Does RAP 13.4 (b) (3),(4) apply to the following issue:

Assuming viability of a 4.24.510 absolute immunity doctrine for all self-reported child abuse allegations from all minors to otherwise private persons:

Does minority status (per se) put all minors into the class of

persons too young to be “required to call the police” to get .510  
absolute immunity, and does the per-se nature of this class of  
immune persons render as irrelevant the individual capacity of  
the minor to call (or decline to call) police, the statement’s  
timing, the minor’s intent on to whom to complain, as  
conclusive legal presumptions of fact based on minority status,  
or can they be relevant disputable factual questions beyond (or  
within) CR 56 procedures?

*Zellmer v. Zellmer*, 164 Wn.2d 147 at 151. See also  
concurrency/dissent. (2008).

Respectfully Submitted, July 30<sup>th</sup>, 2021

*Kenneth Henrikson* (E sig)

Ken Henrikson, #17592, Amicus.

**KENNETH HENRIKSON LAW**

**July 30, 2021 - 12:10 PM**

**Transmittal Information**

**Filed with Court:** Supreme Court  
**Appellate Court Case Number:** 99672-5  
**Appellate Court Case Title:** K.M.P., et ano. v. Big Brothers Big Sisters of Puget Sound, et al.

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Address:  
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