

FILED  
SUPREME COURT  
STATE OF WASHINGTON  
8/12/2022 10:42 AM  
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SUPREME COURT  
OF THE STATE OF WASHINGTON

SINA GHODSEE, an  
individual, through Litigation  
Guardian ad Litem, JOSHUA  
BROTHERS,

Petitioners,

and

SHAHRBANOO GHODSEE,  
an individual,

Plaintiff,

v.

CITY OF KENT, a political  
subdivision of the State of  
Washington,

Respondent.

and

KING COUNTY, d/b/a King  
County Crisis and  
Commitment Services,

Defendant.

No. 100892-9

STATEMENT OF  
ADDITIONAL  
AUTHORITIES

COMES NOW the petitioner Sina Ghodsee, who submits the following additional authority to the Court pursuant to RAP 10.8:

- *Desmet v. State*, \_\_ Wn.2d \_\_, \_\_ P.3d \_\_, 2022 WL 3270004 (2022) (Court strictly construed the language of an immunity statute, RCW 4.24.595, just as Division I failed to do as to RCW 71.05.120(1), the immunity statute at issue here).

This document contains 60 words, excluding the parts of the document exempted from the word count by RAP 18.17.

DATED this 12<sup>th</sup> day of August, 2022.

Respectfully submitted,

/s/ Philip A. Talmadge

Philip A. Talmadge, WSBA #6973

Talmadge/Fitzpatrick

2775 Harbor Avenue SW

Third Floor, Suite C

Seattle, WA 98126

(206) 574-6661

John R. Connelly, Jr., WSBA #12183

Meaghan M. Driscoll, WSBA #49863

Samuel J. Daheim, WSBA #52746

Connelly Law Offices, PLLC

2301 North 30th Street

Tacoma, WA 98403

(253) 593-5100

Attorneys for Petitioner Ghodsee

DECLARATION OF SERVICE

On said day below I electronically served a true and accurate copy of the *Petitioners' Statement of Additional Authorities* in Supreme Court Cause No. 100892-9 to the following:

John R. Connelly  
Meaghan M. Driscoll  
Samuel J. Daheim  
Connelly Law Offices, PLLC  
2301 North 30th Street  
Tacoma, WA 98403

Andrew Cooley  
Keating, Bucklin & McCormack, Inc., P.S.  
801 Second Avenue, Suite 1210  
Seattle, WA 98104

Samantha D. Kanner  
Daniel L. Kinerk  
Senior Deputy Prosecuting Attorneys  
500 Fourth Avenue, Ninth Floor  
Seattle, WA 98104

Paulette R. Burgess  
NAMI Washington  
1107 NE 45th Street, Suite 330  
Seattle, WA 98105

Original E-filed via appellate portal:  
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: August 12, 2022 at Seattle, Washington.

/s/ Brad Roberts  
\_\_\_\_\_  
Brad Roberts, Legal Assistant  
Talmadge/Fitzpatrick

# TALMADGE/FITZPATRICK

August 12, 2022 - 10:42 AM

## Transmittal Information

**Filed with Court:** Supreme Court  
**Appellate Court Case Number:** 100,892-9  
**Appellate Court Case Title:** Sina Ghodsee, et al. v. City of Kent, et ano.

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- dkinerk@comcast.net
- jconnelly@connelly-law.com
- matt@tal-fitzlaw.com
- mdriscoll@connelly-law.com

### Comments:

Statement of Additional Authorities

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Sender Name: Brad Roberts - Email: brad@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

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