

CLERK IN THE SUPREME COURT OF THE STATE OF WASHINGTON

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|----------------------|---|-----------------------|
| STATE OF WASHINGTON, | ) | No. 101173-3          |
| Respondent,          | ) |                       |
|                      | ) | STATEMENT             |
|                      | ) | OF ADDITIONAL         |
|                      | ) | AUTHORITIES           |
| VICTOR PANIAGUA,     | ) | (RAP 10.8) AND NOTICE |
| Appellant            | ) | OF RELATED CASE       |

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Pursuant to RAP 10.8, appellant Victor Alfonso Paniagua submits the following statement of additional authorities and notice of related case:

On September 30, 2022, this Court received a motion for discretionary review in *In Re Boyd Stacy*, #101335-3. The *Stacy* case raises the same issue raised by Mr. Paniagua: Whether a bail jumping conviction based on the void PCS statute is unconstitutional.

Mr. Stacy's briefing and decision timeline is behind the schedule in this case. Nonetheless, Mr. Stacy's request for review demonstrates review should be accepted. The issue is recurring and this Court should provide a final answer for trial courts and practitioners.

DATED this 28th day of October 2022.

This document contains 103 words and complies with RAP  
18.17.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Kate Benward', written in a cursive style.

KATE L. BENWARD (WSBA 43651)  
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## DECLARATION OF FILING AND MAILING OR DELIVERY

The undersigned certifies under penalty of perjury under the laws of the State of Washington that on the below date, the original of the document to which this declaration is affixed/attached, was filed in the **Washington State Supreme Court** under **Case No. 101173-3**, and a true copy was mailed with first-class postage prepaid or otherwise caused to be delivered to the following attorney(s) or party/parties of record at their regular office or residence address as listed on ACORDS:

- respondents Shawn Sant & Frank Jenny, DPAs  
[ssant@franklincountywa.gov; fjenny@co.franklin.wa.us]  
[appeals@co.franklin.wa.us]  
Franklin County Prosecutor's Office
- appellant
- Attorneys for amici



TREVOR O'HARA, Legal Assistant  
Washington Appellate Project

Date: October 28, 2022

# WASHINGTON APPELLATE PROJECT

October 28, 2022 - 3:46 PM

## Transmittal Information

**Filed with Court:** Supreme Court  
**Appellate Court Case Number:** 101,173-3  
**Appellate Court Case Title:** State of Washington v. Victor Alfonso Paniagua  
**Superior Court Case Number:** 18-1-50354-9

### The following documents have been uploaded:

- 1011733\_Briefs\_20221028154506SC067463\_5343.pdf  
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### Comments:

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