

FILED
SUPREME COURT
STATE OF WASHINGTON
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SUPREME COURT
OF THE STATE OF WASHINGTON

SIMONE SCOTT, Personal
Representative on Behalf of the
Estate of SHAMARRA SCOTT,
an individual,

Respondent,

v.

CITY OF TACOMA, a municipal
corporation; WADE and JANE
DOE WHITE a marital
community,

Petitioners.

No. 102630-7

STATEMENT OF
ADDITIONAL
AUTHORITIES

Respondent Scott Estate provides this additional authority to the Court on the City's legal causation argument. In *M.N. v. MultiCare Health System, Inc.*, __ Wn.3d __, __ P.3d __, 2024 WL 188345 (2024), the Court reversed a Court of Appeals decision that had dismissed plaintiffs' emotional distress claims on legal causation grounds; the Court reaffirmed its oft-expressed views on legal causation at * 3-4, and specifically noted that "[w]hen someone is harmed by another, it is only fair

that the injured party is compensated by the wrongdoer.” *Id.* at

*6. This fulfills the deterrent effect of tort law. *Id.*

The City’s legal causation argument does not merit review. RAP 13.4(b).

This document contains 110 words, excluding the parts of the document exempted from the word count by RAP 18.17.

DATED this 18th day of January, 2024.

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

Benjamin P. Compton
WSBA #44567
James Gooding
WSBA #23833
Jonathan C. Yousling
WSBA #44638
Shaun Callahan
WSBA #47997
GLP Attorneys, P.S. Inc.
2601 Fourth Avenue, Floor 6

Seattle, WA 98121
(206) 448-1992

Patricia Padilla Skrinar
WSBA #13772
Skrinar Law Offices
524 Tacoma Avenue S.
Tacoma, WA 98402-5416
(253) 383-0708

Attorneys for Respondent

DECLARATION OF SERVICE

On said day below I electronically served via email a true and accurate copy of the *Statement of Additional Authorities* in Supreme Court Cause No. 102630-7 to the following:

Benjamin P. Compton, WSBA #44567
James Gooding, WSBA #23833
Jonathan C. Yousling, WSBA #44638
Shaun Callahan, WSBA #47997
GLP Attorneys, P.S. Inc.
2601 Fourth Avenue, Floor 6
Seattle, WA 98121
bcompton@glpattorneys.com
jyousling@glpattorneys.com
jgooding@glpattorneys.com
SCallahan@glpattorneys.com

Patricia Padilla Skrinar, WSBA #13772
Skrinar Law Offices
524 Tacoma Avenue S.
Tacoma, WA 98402-5416
(253) 383-0708
pskrinar@skrinarlaw.com

Timothy A. Bradshaw, WSBA #17983
Thomas J. Bone, WSBA #43965
Steven W. Fogg, WSBA #23528
Blake Marks-Dias, WSBA #28169
Eric A. Lindberg, WSBA #43596
Corr Cronin, LLP
1001 Fourth Ave, Suite 3900
Seattle, WA 98154-1051
tbradshaw@corrchronin.com
sfogg@corrchronin.com

bmarksdias@corrcronin.com
jbone@corrcronin.com
elindberg@corrcronin.com

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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: January 18, 2024, at Seattle, Washington.

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

TALMADGE/FITZPATRICK

January 18, 2024 - 11:28 AM

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- msullivan@corrchronin.com
- pskrinar@skrinarlaw.com
- sfogg@corrchronin.com
- tbradshaw@corrchronin.com

Comments:

Statement of Additional Authorities

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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