

FILED  
SUPREME COURT  
STATE OF WASHINGTON  
1/30/2018 12:42 PM  
BY SUSAN L. CARLSON  
CLERK

NO. 951543

**SUPREME COURT OF THE STATE OF WASHINGTON**

JAMES D. MOCK, DANELLE BAME,  
on behalf of minor child J.B. (DOB  
06/09/01) and LINDA and TOM RYAN,  
a married couple,

APPELLANTS,

v.

THE STATE OF WASHINGTON, by  
and through its DEPARTMENT OF  
CORRECTIONS, STATE OF  
WASHINGTON (DOC),

RESPONDENT.

RESPONDENT'S  
STATEMENT OF  
SUPPLEMENTAL  
AUTHORITIES

Pursuant to RAP 10.8, Respondent provides the following additional  
authority for the Court's consideration:

- *State v. Bigsby*, 189 Wn.2d 210, 399 P.3d 540 (2017)

RESPECTFULLY SUBMITTED this 30th day of January, 2018.

ROBERT W. FERGUSON  
Attorney General

*s/ Paul J. Triesch*  
\_\_\_\_\_  
PAUL J. TRIESCH  
WSBA #17445  
Assistant Attorney General  
Attorney for Respondent  
800 Fifth Ave., Ste. 2000  
Seattle, WA 98104  
(206) 464-7352

## DECLARATION OF SERVICE

I hereby declare that on this 30th day of January 2018, I caused to be electronically filed the foregoing document: Respondent's Statement of Additional Authorities, and which will also send notification to:

*Counsel for Petitioners/Plaintiffs:*

Philip Arnold – [parnold@campichearnold.com](mailto:parnold@campichearnold.com)  
Jeffery Campiche - [jcampiche@campichearnold.com](mailto:jcampiche@campichearnold.com)  
Brent Hart – [bhart@hartjarvischang.com](mailto:bhart@hartjarvischang.com)  
Kenneth Chang – [kchang@hartjarvischang.com](mailto:kchang@hartjarvischang.com)  
[zjarvis@hartjarvischang.com](mailto:zjarvis@hartjarvischang.com)

*Litigation GAL:*

Joshua Brothers – [joshb@dussaultlaw.com](mailto:joshb@dussaultlaw.com)  
William Dussault – [billd@dussaultlaw.com](mailto:billd@dussaultlaw.com)

I declare under penalty of perjury, under the laws of the State of Washington, that the foregoing is true and correct.

DATED this 30th day of January, 2018 at Seattle, Washington.

*Valerie Tucker*

---

VALERIE TUCKER - Legal Assistant to:  
PAUL J. TRIESCH, WSBA #17445,  
Assistant Attorney General  
Attorneys for Respondent  
800 Fifth Avenue, Suite 2000  
Seattle WA 98104  
Tel: 206-464-7352  
Email: [valeriet@atg.wa.gov](mailto:valeriet@atg.wa.gov)

# AGO TORTS SEATTLE

January 30, 2018 - 12:42 PM

## Transmittal Information

**Filed with Court:** Supreme Court  
**Appellate Court Case Number:** 95154-3  
**Appellate Court Case Title:** James D. Mock, et al. v. State of Washington, Department of Corrections  
**Superior Court Case Number:** 15-2-05471-6

### The following documents have been uploaded:

- 951543\_State\_of\_Add\_Authorities\_20180130124115SC242992\_3875.pdf

This File Contains:

Statement of Additional Authorities

*The Original File Name was StmtOfAddAuthorities.pdf*

### A copy of the uploaded files will be sent to:

- bhart@hjmc-law.com
- billd@aiken.com
- cprreader@atg.wa.gov
- jcampiche@campichearnold.com
- joshb@brothershenderson.com
- kchang@hjmc-law.com
- parnold@campichearnold.com
- smacias@campichearnold.com
- tadr@atg.wa.gov
- zach.jarvis@gmail.com
- zjarvis@hjmc-law.com

### Comments:

---

Sender Name: Valerie Tucker - Email: valeriet@atg.wa.gov

**Filing on Behalf of:** Paul J. Triesch - Email: pault@atg.wa.gov (Alternate Email: TorSeaEF@atg.wa.gov)

#### Address:

800 5th Avenue, Suite 2000

Seattle, WA, 98104

Phone: (206) 464-7352

**Note: The Filing Id is 20180130124115SC242992**