

FILED
SUPREME COURT
STATE OF WASHINGTON
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I certify (or declare) under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.
DATED Mar. 4, 2019
Port Angeles, WA

Filed at the Washington State
Supreme Court
Temple of Justice,
Olympia, WA 98504-0929

IN THE SUPREME COURT OF WASHINGTON

THE STATE OF WASHINGTON,)
) No. 96525-1
 Respondent,)
) STATE'S RESPONSE TO APPELLANT'S
 v.) MOTION TO SUPPLEMENT THE RECORD
)
 JAMES VINES,)
)
 Appellant.)

I. IDENTITY OF MOVING PARTY

The respondent, STATE OF WASHINGTON, asks this Court for the relief designated in Part II of this motion.

II. STATEMENT OF RELIEF SOUGHT

The State respectfully moves the Court to deny the Appellant's motion to supplement the record with his forensic evaluation reports which were not in the record before the Court of Appeals.

State's Response to Motion to
Supplement Record;
Page 1 of 2



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III. FACTS RELEVANT TO MOTION

Mr. Vines filed a request, dated Jan. 31, 2019, to supplement the record with a psychological evaluation. The psychological evaluation itself is dated Dec. 31, 2010. This record is intended to be read in conjunction with the Petition for Review.

IV. GROUNDS FOR RELIEF AND ARGUMENT

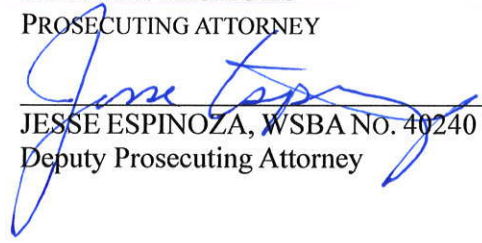
The psychological evaluation does not advance any of the criteria for accepting review under RAP 13.4(b). Further, the relevance of the evaluation in reviewing the Court of Appeals decision in this case is questionable considering that it was dated in Dec. 2010 and was not before the Court of Appeals on direct review.

IV. CONCLUSION

Therefore, the State moves this Court to deny the motion to supplement the record.

DATED this 4th day of March, 2019.

MARK B. NICHOLS
PROSECUTING ATTORNEY



JESSE ESPINOZA, WSBA NO. 40240
Deputy Prosecuting Attorney



CLALLAM COUNTY DEPUTY PROSECUTING ATTORN

March 04, 2019 - 4:30 PM

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: 96525-1
Appellate Court Case Title: State of Washington v. James Robert Vines
Superior Court Case Number: 16-1-00481-3

The following documents have been uploaded:

- 965251_Answer_Reply_20190304162748SC465688_9433.pdf
This File Contains:
Answer/Reply - Answer to Motion
The Original File Name was Vines - 96525-1 -Response to Appellants Motion to Supplement Record.pdf

A copy of the uploaded files will be sent to:

- js8430314@gmail.com

Comments:

Answer to Appellant's Motion to Supplement the Record

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