
Conflict of Laws—Limitation of Actions—Choice of Law—Foreign Limitation Period—Threshold Inquiry—Conflict in Substantive Law—Necessity.

Whether in a Washington personal injury suit based on an automobile accident that occurred in Idaho, the Court of Appeals erred in holding that the Idaho statute of limitation applies without first determining whether there is a conflict between Idaho and Washington law on the substantive issue involved in the suit, and if so, whether a conflict exists.

No. 91270-0, *Woodward* (petitioner) v. *Taylor* (respondent).

185 Wn. App. 1 (2014)

Courts—Jurisdiction—Nonresidents—Foreign Manufacturer—Fair Play and Substantial Justice—Transaction of Business—Product in Stream of Commerce—Connection With Forum State—Sufficiency.

Whether in an action under the Consumer Protection Act alleging a price-fixing conspiracy in the marketing of cathode ray tubes, defendant nonresident consumer electronics manufacturers had sufficient contacts with Washington to subject them to the personal jurisdiction of Washington courts.

No. 91391-9, *State* (respondent) v. *LG Electronics, et al.* (petitioner).

185 Wn. App. 394 (2015)

Criminal Law—Punishment—Sentence—Credit for Detention—Time Served Before Sentencing—Current Offenses—Existing Detention on Intervening Conviction—Overlapping Credit—Whether Allowed.

Whether in sentencing a defendant on multiple current offenses where the defendant is already serving a sentence imposed on a later-charged offense, the trial court is required under RCW 9.94A.505(6) to give the defendant full presentence jail credit on the current offenses.

No. 91180-1, *State* (respondent) v. *Lewis* (petitioner).

Unpublished

Criminal Law—Punishment—Sentence—Life Imprisonment Without Parole—
Persistent Offender Accountability Act—Prior Convictions—Vehicular
Manslaughter—California Offense.

Whether a criminal defendant’s prior California conviction for vehicular
manslaughter is a “most serious offense” under Washington’s Persistent Offender
Accountability Act.

No. 91297-1, *State* (petitioner) *v.* *Farnsworth* (respondent) (*see also* Criminal Law—
Robbery—First Degree Robbery—Against Financial Institution—Threat—Robbery
Note—“Put the Money in the Bag”).

184 Wn. App. 305 (2014)

Criminal Law—Robbery—First Degree Robbery—Against Financial Institution—
Threat—Robbery Note—“Put the Money in the Bag.”

Whether in a prosecution for first degree robbery of a financial institution, a
handwritten note directing a bank teller to put money in a bag without dye packs or
tracking devices constituted a threatened use of force, violence, or fear of injury for
purposes of the definition of robbery, RCW 9A.56.190.

No. 91297-1, *State* (petitioner) *v.* *Farnsworth* (respondent) (*see also* Criminal Law—
Punishment—Sentence—Life Imprisonment Without Parole—Persistent Offender
Accountability Act—Prior Convictions—Vehicular Manslaughter—California
Offense).

184 Wn. App. 305 (2014)

Criminal Law—Trial—Joinder or Severance—Codefendant’s Statements—
Confrontation Clause—Testimonial or Nontestimonial Statement—Effect—Harmless
Error.

Whether under *Bruton v. United States*, 391 U.S. 123, 88 S. Ct. 1620, 20 L. Ed. 2d
476 (1968), and *Crawford v. Washington*, 541 U.S. 36, 124 S. Ct. 1354, 158 L. Ed.
2d 177 (2004), the trial court in a criminal prosecution erred in admitting a
codefendant’s out-of-court statements concerning the defendant’s culpability or in not
severing the trials, and if so, whether the error was harmless.

No. 91331-5, *State* (respondent) *v.* *Wilcoxon* (petitioner).

185 Wn. App. 534 (2015)

Judgment—Foreign Judgment—Full Faith and Credit—Domestic Real Property

Whether, in a judicial foreclosure action, a Washington court determining the validity of a deed of trust that encumbers Washington property is constitutionally required to afford full faith and credit to an Idaho court order that authorized execution of the deed of trust by a conservator.

No. 91283-1, *OneWest Bank, FSB* (petitioner) v. *Erickson* (respondent).

184 Wash. App. 462 (2014)

Limitation of Actions—Consumer Protection—State Enforcement—Parens Patriae Action—Limitation Period—Exemption—Applicability.

Whether the exemption of the State from any statute of limitations under RCW 4.16.160 applies to an action to enforce the Consumer Protection Act brought by the State as parens patriae pursuant to RCW 19.86.080(1).

No. 91263-7, *State* (respondent) v. *LG Electronics, et al.* (petitioner).

185 Wn. App. 123 (2014)

Vendor and Purchaser—Title—Title Insurance—Later Discovered Encumbrance—Damages—Diminution in Value—Tender by Insurer—Breach of Contract Action Against Insurer—Jury Finding of No Breach and No Award of Damages.

Whether in a breach of contract lawsuit against a title insurance company for diminished value of land due to a previously undiscovered easement, the jury properly found that the insurer did not breach the policy and thus awarded the insured nothing, even though it was undisputed that the insured suffered a covered loss and the insurer had previously tendered payment under the policy.

No. 91301-3, *Millies, et ux.* (petitioner) v. *LandAmerica Transnation, et al.* (respondent).

Unpublished
