

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION II

In Re Personal Restraint of:) CoA No. 47455-7-II
)
JOSEPH LEIF WOLF) NOTICE OF
) SUPPLEMENTAL
) AUTHORITY IN SUPPORT
) OF MOTION TO MODIFY
) COMMISSIONER’S
) RULING,
) AND IN SUPPORT OF
) PERSONAL RESTRAINT
) PETITION

Pursuant to RAP 10.8, Petitioner respectfully cites the following additional authority in support of his Motion to Modify Commissioner’s Ruling imposing stay and in support of his Personal Restraint Petition:

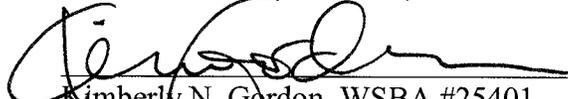
Oral Argument at 20:30, *State v. Duncan*, No. 901881 (Wash. Sup. Ct. argued Nov. 17, 2015) (The Washington Supreme Court held oral argument in *Duncan* after the stay was imposed but before this Court considered Petitioner’s Motion to Modify the stay. During oral argument, the state conceded that a court, at the time of a motion to remit – or modify – legal financial obligations, is considering a “whole different set of standards” than what a sentencing judge must consider before imposing LFOs pursuant to RCW 10.01.160(3), such that one proceeding is not a substitute for the other.)

NOTICE OF SUPPLEMENTAL AUTHORITY -- 1

DATED this 24th day of November, 2015.

Respectfully submitted,

GORDON & SAUNDERS, PLLC

A handwritten signature in black ink, appearing to read 'Kimberly N. Gordon', written over a horizontal line.

Kimberly N. Gordon, WSBA #25401
Attorney for Petitioner Joseph Wolf

NOTICE OF SUPPLEMENTAL AUTHORITY -- 2

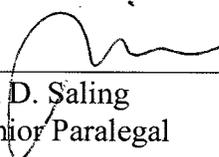
gordon & saunders
1111 Third Avenue, Suite 2220
Seattle, Washington 98101
Tel. 206.340.6034/ Fax. 206.682.3746

DECLARATION OF DOCUMENT FILING AND SERVICE

I, Ian D. Saling, state that on this 24th Day of November, 2015, I caused the **Notice of Supplemental Authority in Support of Motion to Modify Commissioner's Ruling, and in Support of Personal Restraint Petition** to be filed in the **Court of Appeals – Division II**, and a true and correct copy of the same to be served on the following in the manner indicated below:

<input checked="" type="checkbox"/>	James Schacht	<input type="checkbox"/>	U.S. Mail
	Pierce County Prosecuting Atty Ofc.	<input checked="" type="checkbox"/>	Email
	930 Tacoma Ave S Rm 946	<input type="checkbox"/>	_____
	Tacoma, WA 98402-2171		
	Email: jschach@co.pierce.wa.us		

Signed in Seattle, Washington on this 24th Day of November, 2015.

X 

Ian D. Saling
Senior Paralegal

GORDON & SAUNDERS LAW OFFICE

November 24, 2015 - 2:56 PM

Transmittal Letter

Document Uploaded: 3-prp2-474557-Statement of Additional Authorities~4.pdf

Case Name: In Re Personal Restraint of Joseph Wolf

Court of Appeals Case Number: 47455-7

Is this a Personal Restraint Petition? Yes No

The document being Filed is:

Designation of Clerk's Papers Supplemental Designation of Clerk's Papers

Statement of Arrangements

Motion: _____

Answer/Reply to Motion: _____

Brief: _____

Statement of Additional Authorities

Cost Bill

Objection to Cost Bill

Affidavit

Letter

Copy of Verbatim Report of Proceedings - No. of Volumes: _____

Hearing Date(s): _____

Personal Restraint Petition (PRP)

Response to Personal Restraint Petition

Reply to Response to Personal Restraint Petition

Petition for Review (PRV)

Other: _____

Comments:

Notice of Supplemental Authority in Support of Motion to Modify Commissioner's Ruling, and in Support of Personal Restraint Petition

Sender Name: Jason B Saunders - Email: jason@gordonsaunderslaw.com

A copy of this document has been emailed to the following addresses:

jschacht@co.pierce.wa.us
kim@gordonsaunderslaw.com
robert@gordonsaunderslaw.com
ian@gordonsaunderslaw.com