

NO. 49641-1

**COURT OF APPEALS, DIVISION II
STATE OF WASHINGTON**

STATE OF WASHINGTON, RESPONDENT

v.

JONATHAN HARRIS, APPELLANT

Appeal from the Superior Court of Pierce County
The Honorable Susan Serko

No. 15-1-02431-2

BRIEF OF RESPONDENT

MARK LINDQUIST
Prosecuting Attorney

By
Robin Sand
Deputy Prosecuting Attorney
WSB # 47838

930 Tacoma Avenue South
Room 946
Tacoma, WA 98402
PH: (253) 798-7400

Table of Contents

A. ISSUES PERTAINING TO APPELLANT'S ASSIGNMENTS OF ERROR..... 1

 1. Should this Court deny the defendant’s request to withdraw his guilty plea when he knowingly, voluntarily and intelligently entered into his plea agreement and waived his right to appeal? 1

 2. Should this Court dismiss the defendant’s claim that his sentence violates double jeopardy where he waived his right to appeal the sentence and pleaded guilty to charges occurring on different dates? 1

B. STATEMENT OF THE CASE. 1

 1. Procedure 1

 2. Facts..... 3

C. ARGUMENT..... 7

 1. DEFENDANT’S CHALLENGE SHOULD BE REJECTED BECAUSE HIS PLEA WAS ENTERED INTO KNOWINGLY, INTELLIGENTLY, HE VOLUNTARILY WAIVED HIS RIGHT TO APPEAL PURSUANT TO A VALID PLEA AGREEMENT WITH THE STATE AND THE DOCTRINE OF INVITED ERROR PRECLUDES REVIEW OF THE ISSUE 7

 2. DEFENDANT’S SENTENCE DOES NOT VIOLATE DOUBLE JEOPARDY AS IT WAS KNOWINGLY, VOLUNTARILY AND INTELLIGENTLY ENTERED INTO AS PART OF A PLEA AGREEMENT WITH DIFFERENT INCIDENT DATES FOR EACH CRIME..... 13

D. CONCLUSION. 16-17

Table of Authorities

State Cases

<i>In re Breedlove</i> , 138 Wn.2d 298, 312, 979 P.2d 417 (1999).....	12
<i>In re Personal Restraint of Breedlove</i> , 138 Wn.2d 298, 309, 979 P.2d 417 (1999)	8
<i>State v. Cooper</i> , 63 Wn. App. 8, 14, 816 P.2d 734 (1991).....	12
<i>State v. Dunaway</i> , 109 Wn.2d 207, 215, 743 P.2d 1237 (1988).....	15
<i>State v. Flake</i> , 76 Wn. App. 174, 180, 883 P.2d 341 (1994).....	15
<i>State v. Haddock</i> , 141 Wn.2d 103,110, 3 P.2d 733 (2000).....	15
<i>State v. Henderson</i> , 114 Wn.2d, 867, 871, 792 P.2d 514 (1990)	12
<i>State v. Knight</i> , 162 Wn.2d 806, 811, 174 P.3d 1167 (2008)	14
<i>State v. Lee</i> , 132 Wn.2d 498, 505-06, 939 P.2d 1223 (1997)	8, 9
<i>State v. Lessley</i> , 118 Wn.2d 773, 777, 827 P.2d 996 (1992).....	15
<i>State v. Neff</i> , 163 Wn.2d 453, 459, 181 P.3d 819 (2008)	8
<i>State v. Perkins</i> , 108 Wn.2d 212, 215, 737 P.2d 250 (1987).....	7, 8
<i>State v. Sweet</i> , 90 Wn.2d 282, 286, 581 P.2d 579 (1978).....	7
<i>State v. Wakefield</i> , 130 Wn.2d 464, 475, 925 P.2d 183 (1996).....	12
<i>State v. Westling</i> , 145 Wn.2d 607, 610, 40 P.3d 669 (2002).	14

Federal and Other Jurisdictions

<i>United States v. Broce</i> , 488 U.S. 563, 575-76, 109 S. Ct. 757, 102 L. Ed. 2d 927 (1989).....	14
--	----

Constitutional Provisions

Article I, section 9 13

Const. art. I, § 22 7

Fifth Amendment to the United States Constitution 13

Statutes

RCW 9.94A 9

RCW 9.94A.400 15

RCW 9.94A.589 15

RCW 9.94A.589(1)(a) 15

A. ISSUES PERTAINING TO APPELLANT'S ASSIGNMENTS OF ERROR.

1. Should this Court deny the defendant's request to withdraw his guilty plea when he knowingly, voluntarily and intelligently entered into his plea agreement and waived his right to appeal?
2. Should this Court dismiss the defendant's claim that his sentence violates double jeopardy where he waived his right to appeal the sentence and pleaded guilty to charges occurring on different dates?

B. STATEMENT OF THE CASE.

1. Procedure

On June 23rd 2015, the State charged Jonathan Daniel Harris, herein the defendant, with one count of Murder in the Second Degree. CP 1-2. On November 3rd 2015, the charge was amended to Premeditated Murder in the First Degree. CP 5. The Supplemental Declaration for Determination of Probable Cause filed in support of amended charges contained information from the medical examiner's report indicating that the victim, Katherine Taylor, was stomped to death. CP 6-7.

On July 27th 2016, the defendant entered a plea agreement to which he pleaded guilty to a Second Amended Information charging one count of Murder in the Second Degree, one count of Assault in the Second

Degree and one count of Assault in the Third Degree. CP 8-9, 1RP 6-22. The trial court accepted the Second Amended Information, Prosecutor's Statement regarding amended information, plea agreement/sentence recommendation, engaged in full colloquy with both State, defense counsel and the defendant. 1RP 1-22. After accepting and reviewing all documents as well as going through the colloquies, the trial court accepted the defendant's plea as knowing, intelligent and voluntary. 1RP 1-22.

The defendant filed a motion to proceed pro se and withdraw his guilty plea on August 22nd 2016 alleging amongst other things, that his defense attorney Mark Quigley forced and mislead him into pleading guilty. CP 34-62. On August 22nd 2016, the trial court granted the defendant's motion to proceed pro se. 2RP 10. The trial court also denied the defendant's motion to withdraw his guilty plea on August 24th 2016. 3RP 42-43. In doing so, the trial court heard arguments as well as testimony from the defendant before finding, "I'm more than satisfied that a manifest injustice is not present in this case; that you are not credible, frankly, in the statements that you've made today and in your motion, and I am denying the motion to withdraw guilty plea." 3RP 42-43.

On September 9th 2016, the trial court granted the defendant's motion to substitute counsel and appointed John Hill to represent him. 4RP 3. Defense counsel filed a notice of offender score dispute and

objection by defendant to the State's proposed sentencing reform act (SRA) offender score and standard range on October 28th 2016. CP 183-184, 185-254. The State filed its response on October 31st 2016. CP 448-451.

On October 31st 2016, the trial court retained the offender scores outlined in the original plea agreement and proceeded to sentencing. 6RP 16-17. The defendant was sentenced to the following: 316 months in custody with 36 months of community custody on Count I; 57 months in custody with 19 months of community custody on Count II; and 16 months in custody on Count III, all to be served concurrently for a total of 316 months in custody. 6RP 42-43, CP 456-479. The court also imposed mandatory legal financial obligations and no contact with the family members of the victim. 6RP 42-43, CP 456-479. Defendant filed a Notice of Appeal on the same day. CP 470.

2. Facts

The Supplemental Declaration for Determination of Probable Cause reads as follows:

On June 6, 2015, Nicole White was seen leaving a bar in Spanaway with Jonathan Harris, the defendant. When White did not return home June 7, 2015, she was reported missing. White's vehicle was found abandoned near the defendant's residence.

Harris told detectives that he met White at the bar and that she gave him a ride home. Before they reached the defendant's residence he

asked White to stop at a convenience store so he could use the restroom. Harris said that he went into the store to use the restroom, and when he came out White was gone. Harris reported that he used a pay phone to call White, but that she did not answer. He told detective that he then walked home and had not seen White since.

Detectives contacted the bar and obtained video footage of Harris and White together. Harris was wearing a dark hooded sweatshirt. A sweatshirt was recovered as the defendant's residence that appeared to be the same as depicted in the video. Detectives located blood on the sweatshirt, and the blood was analyzed and determined to be White's blood. Detectives processed the defendant's residence and located several areas of blood that are being processed.

Detectives contacted the convenience store that Harris claimed to have used the restroom at, and where he last saw White. The attendant reported that he had not seen Harris on June 6 or the early morning hours on June 7, 2015, and said customers are not allowed to use the restroom at the time that Harris said he was there. Detectives reviewed video evidence from the store and Harris did not enter the store as he reported. There was no pay phone at the store.

While searching the defendant's residence detectives contacted his neighbor. The neighbor reported that a woman matching White's description arrived at her residence on June 6, 2015 at approximately 10 pm and asked for the defendant. The same neighbor told detectives that

she heard a female screaming at the defendant's residence at 4 pm on June 7, 2015. The screaming stopped abruptly.

The defendant's vehicle was equipped with an ignition interlock device. This device obtains photographic images when Harris blows into it. On June 7, 2015, the device obtained an image of the defendant, and the photograph revealed that his vehicle was in a wooded area. The defendant's phone records indicated that his phone was registering off of a tower with landscape that is consistent with the photograph the ignition interlock device recorded. On June 20, 2015, detectives located a body around the area that the defendant's phone was registering.

The body was located at the bottom of an embankment and was wrapped in a green tarp. The body was badly decomposed, but there was a visible tattoo on one of the legs. The medical examiner was able to determine that the remains were of a female body, approximately the same height as White. White's family confirmed that the tattoo that was visible was White's. White had a skull fracture, an orbital fracture, a fractured sternum, and several broken ribs. The medical examiner classified White's death as a homicide.

Harris had previously been arrested on federal charges. When he was being processed detectives noted that he [had] *sic* several injuries to his body. He had multiple abrasions on his right arm. His right wrist was swollen. He had abrasions on both knees. He had an abrasion on his side and on his back. Harris claimed that his injuries were sustained when he

fell off a stool at the bar that he and White met. The bartender told detectives that Harris never fell off his stool and did not sustain injuries while at the bar.

White's remains were analyzed by Katherine Taylor, forensic anthropologist with the King County Medical Examiner's Office. Taylor documents cranium fractures fragment the right zygomatic bone into two pieces and separate the maxilla from the remainder of the cranium. There were additional linear fractures involving both nasal bones, both eye orbitals, three fractures to the right side of the frontal bone, a fracture from the mid left parietal along the left inferior lambdoidal suture across the sphenoid across the orbital plates, a fracture of the left zygo-frontal suture, a fracture of the left zygomatic temporal suture, and a fracture of the right greater wing of the sphenoid and squamous of the right temporal bone. The mandible was present in four pieces.

Taylor also analyzed White's sternum and found a complete, slightly diagonal, transverse fracture coursing from the inferior border of the left third costal notch to the superior border of the right third costal notch. Detectives reported that, in speaking with Taylor, this injury is consistent with being stomped.

CP 6-7.

The defendant's statement of defendant on plea of guilty read as follows:

As to Count I, Murder in the Second Degree, in the early morning hours of June 7, 2015, at my residence in Pierce County, Washington State, with intent to cause her death, I severely beat Nicole White, a human being, and thereby caused her death. As to Counts II and III, please see the addendum to his plea for In Re Barr pleas.

CP 27.

C. ARGUMENT.

1. DEFENDANT'S CHALLENGE SHOULD BE REJECTED BECAUSE HIS PLEA WAS ENTERED INTO KNOWINGLY, INTELLIGENTLY, HE VOLUNTARILY WAIVED HIS RIGHT TO APPEAL PURSUANT TO A VALID PLEA AGREEMENT WITH THE STATE AND THE DOCTRINE OF INVITED ERROR PRECLUDES REVIEW OF THE ISSUE.

The Washington Constitution grants a right of appeal to all criminal defendants. Const. art. I, § 22. However, a defendant may waive this right if it is done so knowingly, voluntarily and intelligently, and with a full understanding of the consequences. *State v. Perkins*, 108 Wn.2d 212, 215, 737 P.2d 250 (1987). Waiver is the intentional relinquishment or abandonment of a known right or privilege. *State v. Sweet*, 90 Wn.2d 282, 286, 581 P.2d 579 (1978). The law is clear that a defendant can waive his or her right of appeal in exchange for the dismissal of certain charges or a favorable sentencing recommendation by the prosecutor, or

both. *State v. Perkins*, 108 Wn.2d 212, 215, 737 P.2d 250 (1987); *Accord State v. Lee*, 132 Wn.2d 498, 505-06, 939 P.2d 1223 (1997).

Washington State recognizes a strong public interest in “enforcing the terms of plea agreements which are voluntarily and intelligently made.” *In re Personal Restraint of Breedlove*, 138 Wn.2d 298, 309, 979 P.2d 417 (1999). They are regarded and interpreted as contracts between the parties where both parties are bound by the terms of a valid plea agreement. *Id.* A defendant’s signing of a waiver statement and admission to understanding creates a strong presumption of understanding required for a valid waiver of the constitutional right to appeal in criminal cases. *State v. Neff*, 163 Wn.2d 453, 459, 181 P.3d 819 (2008).

The defendant in the present case was charged with Murder in the First Degree. CP 5. The defendant resolved his case by entering into a plea agreement with the State. CP 12-18. Pursuant to the agreement, defendant agreed that he has the right to appeal any sentence that is outside of the standard sentencing range, but that he waives any and all other appellate rights pertaining to his conviction and sentence. CP 14.

Specifically, the agreement stated:

Waiver of appeal. Defendant understands that he has a right to appeal his convictions. The defendant understands that since he has entered pleas of guilty to the charges in the second amended Information, he has waived his right to raise certain issues, as discussed in his Statement of Defendant on Plea of Guilty, in an appeal. The defendant understands that he has a right to appeal any sentence that is outside of his standard sentencing range. The *defendant*

*hereby waives any and all other appellate rights pertaining to this conviction and sentence as part of this plea agreement in accordance with **State v. Lee**, 132 Wn.2d 498, 505-506 (1997).*

CP 12-18. Emphasis added.

The Defendant, his attorneys, and the prosecutor all signed this agreement. CP 17-18. Below their signatures, there was also a “statement of defendant” which stated:

I hereby agree that I have consulted with my attorneys and fully understand all rights I have as a criminal defendant as to these charges and that I am giving up those rights by voluntarily entering into this plea agreement with the State of Washington, and by entering pleas of guilty to the second amended Information in this case. I further understand that the Sentencing Reform Act, RCW 9.94A, and the sentencing guidelines therein, apply fully to my case, and that the Court is not bound by any recommendation of either party as to the sentence I receive. I have read this plea agreement fully and reviewed each portion of this plea agreement with my attorneys. I understand this agreement and voluntarily agree to it.

CP 17. Defendant’s signature appears below that statement. CP 17. The agreement also included declarations by both of defendant’s attorneys which stated that they “...fully explained to the defendant each and every right he has as a criminal defendant, that he is giving up those rights by entering into this plea agreement with the State of Washington, and by entering pleas of guilty to the Second Amended Information before this Court.... I have carefully reviewed every part of this plea agreement with the defendant. To my knowledge, the defendant’s decision to enter into

this plea agreement is an informed and voluntary one.” CP 18.

Defense counsel thoroughly went over the plea agreement with defendant. At the plea hearing, defense counsel stated, “that plea agreement is signed by all parties; Mr. Lewis, myself, Mr. Katayama and Mr. Harris, and to that end we spent *significant time explaining* to Mr. Harris the contents of this plea agreement. I believe he understands them, I believe he understands his obligations under this plea agreement.” IRP 8.

The court engaged in a thorough colloquy with the defendant prior to accepting his guilty pleas.

THE COURT: are you making your guilty pleas today freely and voluntarily?

THE COURT: Yes, ma’am.

THE COURT: Did anyone force you?

THE COURT: No, ma’am.

THE COURT: Other than what’s been worked out as the plea agreement, have any promises been made to you in exchange for a guilty plea?

THE COURT: No, ma’am.

THE COURT: I’m satisfied that your guilty pleas are being made freely, voluntarily, and intelligently, that you understand the rights you’re giving up and the consequences of your pleas.

IRP 21-22.

A review of defendant’s plea agreement and the record shows that he knowingly, voluntarily, and intelligently entered into the plea

agreement and waived his right to appeal. There is no question that this waiver was done so knowingly, intelligently, and voluntarily by the defendant as evident from the language of the agreement, defendant's own statements and the declarations of his attorneys.

Defendant claims that he was not aware of the greater charge of Premeditated Murder in the First Degree. Brief of Appellant at 9. This claim fails as the court not only referenced the original charges with the defendant during the plea colloquy, but also established that the defendant understood them stating:

THE COURT: As to Counts 2 and 3, those are in the form of an In Re Barr plea and because of that I have read the original declaration that supports the original charges, the prosecutor's statement. I believe that does support *the charges – more serious charges frankly*, and I'm incorporating that declaration into this statement of defendant on plea of guilty. Mr. Harris, do you understand – well, first and foremost, you had a chance to go over this addendum with your counsel; did you not?

THE DEFENDANT: Yes, ma'am

THE COURT: The In Re Barr addendum?

THE DEFENDANT: Yes

THE COURT: Do you have any questions about it?

THE DEFENDANT: No, ma'am

1RP 20-21.

Moreover, the defendant states in the Addendum to plea form for In Re Barr pleas, that "My attorney has discussed with me all of the elements of the original charge and the elements of the *original charge*

and the elements of the amended charges, and I understand them all.” CP 29-30. It is evident from the record that the defendant was well aware of the original charge of premeditated murder in the first degree. As such, this Court should dismiss his claim as it is clear that defendant has knowingly, intelligently, and voluntarily entered his plea and waived the right to appeal his conviction.

In addition, the doctrine of invited error “prohibits a party from setting up an error at trial and then complaining of it on appeal.” *In re Breedlove*, 138 Wn.2d 298, 312, 979 P.2d 417 (1999)(citing *State v. Wakefield*, 130 Wn.2d 464, 475, 925 P.2d 183 (1996)). The doctrine has been considered in cases where defendants were sentenced pursuant to plea bargains and later challenged their sentences on appeal. *Id.* at 312-13 (citing *Wakefield*, 130 Wn.2d at 475 (the doctrine did not apply where a trial judge went beyond the defendant's request that the court participate in plea negotiations); *State v. Cooper*, 63 Wn. App. 8, 14, 816 P.2d 734 (1991)(defendant's statement on plea of guilty that he agreed sentences should be served consecutively was invited error)). Where it applies, the invited error doctrine precludes judicial review even where the alleged error raise constitutional issues. *State v. Henderson*, 114 Wn.2d, 867, 871, 792 P.2d 514 (1990).

In this case, the defendant agreed he would be subject to the imposition of a particular sentence in exchange for reduced charges. CP 12-18. The parties agreed that after pleading guilty to the charges in the

amended information, the defendant's standard range would be 216 to 316 months on the murder charges, with the sentence on the other charges to run concurrently. CP 15. In doing so, the defendant avoided the consequences associated with the original charge of premeditated murder in the first degree; 281 to 374 months in custody and 36 months of community custody. Thus, the defendant avoided approximately 60 months in custody by entering into this plea agreement with the State. Defendant also signed a stipulation on prior record and offender score which reflected his standard range on the murder charge and assault charges. CP 31-34. Additionally, the defendant signed the Statement of Defendant on Plea of Guilty which listed the maximum sentence, fines and standard sentencing ranges for the murder and assault charges. CP 20. Thus, the doctrine of invited error precludes review where the defendant knowingly, voluntarily and intelligently entered into this plea agreement and waived his right to appeal in order to receive the benefit of the reduced charges. As such, this Court should dismiss the defendant's claim and deny his motion to withdraw his guilty plea.

2. DEFENDANT'S SENTENCE DOES NOT VIOLATE DOUBLE JEOPARDY AS IT WAS KNOWINGLY, VOLUNTARILY AND INTELLIGENTLY ENTERED INTO AS PART OF A PLEA AGREEMENT WITH DIFFERENT INCIDENT DATES FOR EACH CRIME.

The double jeopardy clause of the Fifth Amendment to the United States Constitution and article I, section 9 of the Washington State

Constitution prohibit the imposition of multiple punishments for the same offense. *State v. Westling*, 145 Wn.2d 607, 610, 40 P.3d 669 (2002).

After a guilty plea the double jeopardy violation must be clear from the record presented on appeal, or else be waived. *State v. Knight*, 162 Wn.2d 806, 811, 174 P.3d 1167 (2008)(citing *United States v. Broce*, 488 U.S. 563, 575-76, 109 S. Ct. 757, 102 L. Ed. 2d 927 (1989) (defendants were precluded from expanding the record to demonstrate their two convictions for conspiracy stemmed from a single conspiracy)). After a guilty plea, a double jeopardy challenge does not permit a defendant to supplement the record on appeal. *Id.*

a. Defendant waived his right to challenge the sentence.

The defendant's Statement of Defendant on plea of guilty paragraph 6(h) specifically states that "if the court imposes a standard range sentence, then no one may appeal the sentence." CP 23. The defendant was sentenced within the standard range. 6RP 42-43, CP 456-479. Further, the defendant never made any argument or claim that his convictions violated double jeopardy and he was well aware of the standard range he was subject to based upon the calculation of his offender score. As the defendant knowingly, voluntarily and intelligently waived his right to appeal his sentence, this Court should deny his motion to withdraw his plea.

b. Double jeopardy does not apply because the incident dates are different for each crime.

Whether crimes are of the same criminal conduct is relevant for purposes of sentencing under the Sentencing Reform Act. RCW 9.94A.589(1)(a) provides that "if the court enters a finding that some or all of the current offenses encompass the same criminal conduct then those current offenses shall be counted as one crime."

Under RCW 9.94A.589(1)(a), two crimes shall be considered the "same criminal conduct" *only when all three* of the following elements are established: (1) the two crimes share the same criminal intent; (2) the two crimes are committed at the same time and place; and (3) the two crimes involve the same victim. *State v. Lessley*, 118 Wn.2d 773, 777, 827 P.2d 996 (1992) emphasis added (discussing former RCW 9.94A.400, recodified as RCW 9.94A.589 in 2001); *State v. Dunaway*, 109 Wn.2d 207, 215, 743 P.2d 1237 (1988). The Legislature intended the phrase "same criminal conduct" to be construed narrowly. *State v. Flake*, 76 Wn. App. 174, 180, 883 P.2d 341 (1994). If one of these elements is missing, then two crimes cannot constitute the same criminal conduct. *Lessley*, at 778. An appellate court will generally defer to a trial court's decision on whether two different crimes involve the same criminal conduct and will not reverse absent a clear abuse of discretion or a misapplication of the law. *State v. Haddock*, 141 Wn.2d 103,110, 3 P.2d 733 (2000).

Per the plea agreement, the defendant pleaded guilty to the charges in the second amended information which specifically listed each offense as being committed on separate incident dates.¹ CP 8-9. Thus, the crimes do not constitute the same offenses where they were charged as occurring on separate incident dates. The defendant agreed to plead to the assault charges, in addition to the reduced charge of murder in the second degree, with the understanding that it would elevate his offender score. The defendant did so in order to take advantage of the State's agreement to reduce charges. In doing so, the defendant pleaded guilty to the facts and legal consequences of those charges, specifically that each charge constituted its own offense. The defendant cannot now claim that two of his crimes merge when he participated in the plea bargain and was well aware of the sentence he would be receiving.

This Court should dismiss his claim as he knowingly, voluntarily and intelligently waived any right to appeal his sentence and the doctrine of invited error precludes complaint.

D. CONCLUSION.

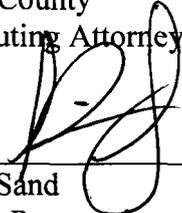
The doctrine of invited error precludes review where the defendant knowingly, voluntarily and intelligently entered into his plea agreement

¹ The incident dates for each offense in the second amended information are as follows: Assault in the third degree, June 5th 2015; Assault in the second degree, June 6th 2015; Murder in the second degree, June 7th 2015. CP 8-9.

and waived his right to appeal in order to receive the benefit of the reduced charges. As such, this Court should dismiss the defendant's claim and deny his motion to withdraw his guilty plea.

DATED: May 1, 2017.

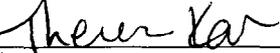
MARK LINDQUIST
Pierce County
Prosecuting Attorney



Robin Sand
Deputy Prosecuting Attorney
WSB # 47838

Certificate of Service:

The undersigned certifies that on this day she delivered by U.S. mail or ABC-LMI delivery to the attorney of record for the appellant and appellant c/o his attorney true and correct copies of the document to which this certificate is attached. This statement is certified to be true and correct under penalty of perjury of the laws of the State of Washington. Signed at Tacoma, Washington, on the date below.

5.1.17 
Date Signature

PIERCE COUNTY PROSECUTOR
May 01, 2017 - 3:23 PM
Transmittal Letter

Document Uploaded: 7-496411-Respondent's Brief.pdf

Case Name: STATE V. HARRIS

Court of Appeals Case Number: 49641-1

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: Respondent's

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:

No Comments were entered.

Sender Name: Therese M Kahn - Email: tnichol@co.pierce.wa.us

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

SCCAAttorney@yahoo.com