

SUPREME COURT  
OF THE STATE OF WASHINGTON

TAMI DAVIS, as Personal Representative  
of the Estate of ALAN DAVIS, deceased;  
and as Trustee for TAMI DAVIS and  
MELISSA DAVIS for the Wrongful Death  
of their Father, ALAN DAVIS,

Appellant,

and

BAUGH INDUSTRIAL CONTRACTORS,  
INC., a Washington corporation; E.J.  
RODY & SONS, INC., a Washington  
corporation,

Respondents,

and

SELPECO RESOURCES, INC., and  
SELPECO RESOURCES, INC. - A  
KNIGHT PIESOLD COMPANY,  
Washington corporations; TUCCI & SONS,  
INC., a Washington corporation;  
TAIHEIYO CEMENT CORPORATION  
and TAIHEIYO CEMENT U.S.A., INC.,  
foreign corporations; WEYERHAUSER  
COMPANY, and WEYERHAUSER REAL  
ESTATE COMPANY, Washington  
corporations; and "UNKNOWN BUSINESS  
ENTITIES I-X," jointly and severally,

Defendants.

NO. 76696-7

STATEMENT OF  
ADDITIONAL  
AUTHORITIES

RECEIVED  
SUPREME COURT  
STATE OF WASHINGTON  
05 NOV 18 AM 10:03  
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CLERK

COMES NOW the appellant Tami Davis and submits the  
following additional authorities to the Court pursuant to RAP 10.8:

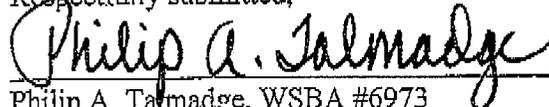
Statement of Additional Authorities - 1

Talmadge Law Group PLLC  
18010 Southcenter Parkway  
Tukwila, Washington 98188-4630  
(206) 574-6661 (206) 575-1397 Fax

- CP 157-58, 161-63, 1847-50 (Selpeco, the owner's representative, was dismissed from the case; it did not undertake to inspect piping at issue in this case nor did it assume a duty of doing so);
- CP 210 (the leak in the piping at issue became apparent to Glacier Northwest several days before the accident as indicated in the USDOL Mine Safety and Health Administration accident report). (This report is subject to a trial court redaction order – CP 1786-89).

DATED this 18th day of November, 2005.

Respectfully submitted,



Philip A. Talmadge, WSBA #6973  
Talmadge Law Group PLLC  
18010 Southcenter Parkway  
Tukwila, WA 98188-4630  
(206) 574-6661

Scott F. Lundberg, WSBA #16178  
Graham, Lundberg & Peschel, P.S., Inc.  
500 John Street  
Seattle, WA 98109-5013  
(206) 448-1992  
Attorneys for Appellant Tami Davis

DECLARATION OF SERVICE

On said day below I deposited in the U. S. Mail a true and accurate copy of the attached document: Statement of Additional Authorities, Cause No. 76696-7, to the following:

Original filed by facsimile with:

Supreme Court  
Clerk's Office  
Olympia, WA

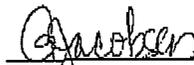
Frank J. Steinmark  
Davis Rothwell  
701 Fifth Avenue, Ste. 2850  
Seattle, WA 98104-7047

Sean E.M. Moore  
Floyd Pflueger  
2505 Third Avenue, Ste. 300  
Seattle, WA 98121

Scott F. Lundberg  
Graham, Lundberg & Peschel, P.S., Inc.  
500 John Street  
Seattle, WA 98109-5013

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

DATED: November 18<sup>th</sup>, 2005, at Tukwila, Washington.



\_\_\_\_\_  
Gabby Jacobsen  
Legal Assistant  
Talmadge Law Group PLLC

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DECLARATION

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