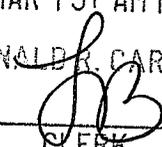


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SUPREME COURT
STATE OF WASHINGTON
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IN THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,

Respondent,

vs

MICHAEL BOYD,

Appellant.

NO. 7931-9

DEFENDANT BOYD'S
JOINDER/ADPTION
OF AMICI'S BRIEF IN ANSWER TO
STATE'S AMICUS BRIEF FROM
CENTER FOR MISSING AND
EXPLOITED CHILDREN

ARGUMENT DATE: 3/13/2007

A. IDENTITY OF PARTY:

The Petitioner Michael Boyd, represented by Barbara Corey, respectfully files this motion to join and adopt the motion to amici briefs filed by the Washington Association of Criminal Defense Attorneys (WADCL) and National Association of Criminal Defense Attorneys (NACDL) in Answer to Amicus Brief of National Center for Missing and Exploited Children (NCMEC).

B. STATEMENT OF RELIEF SOUGHT:

Petitioner Michael Boyd asks this court to permit him to join and adopt the brief of the Washington Association of Criminal Defense Attorneys (WADCL) and National Association of Criminal Defense Attorneys (NACDL) in Answer to Amicus Brief of National Center for Missing and Exploited Children (NCMEC).

PETITIONER BOYD'S
MOTION TO JOIN AND
ADOPT ARGUMENTS

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1 C. GROUNDS FOR RELIEF AND ARGUMENT:

2 RAP 10.1 provides that a party may file an answer to an amicus brief. Petitioner Michael
3 Boyd is a party to this action. See, Associated Grocers v. State, 114 Wn.2d 182, 184 n. 1, 787 P.2d
4 22 (1990); RAP 3.1 – 3.4. This court has accepted the Washington Association of Criminal
5 Defense Attorneys (WADCL) and National Association of Criminal Defense Attorneys (NACDL)
6 as amici in this case.

7 Petitioner Boyd therefore asks this court to permit him to join and adopt the amici briefs of
8 those parties in Answer to the Amicus Brief of the National Center for Missing and Exploited
9 Children.

10 D. CONCLUSION:

11 For the reasons set forth above, Petitioner Boyd respectfully asks this court to permit him
12 to join and adopt the brief of Amici WADCL and NACDL in answer to the Amicus Brief of the
13 National Center for Missing and Exploited Children.

14 DATED: March 13, 2007.

16 _____
17 BARBARA COREY, WSBA #11778
18 Attorney for Petitioner Boyd