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SUPERIOR COURT
STATE OF WASHINGTON

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON, Respondent, v. JOSEPH DOUGLAS NETH, Petitioner.	No. 81361-2 Klickitat County No.06-1-00027-9 COA #25600-6-III STATEMENT OF ADDITIONAL AUTHORITIES
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Pursuant to RAP 10.8, the Petitioner, State of Washington, represented by the Prosecuting Attorney for Klickitat County, by and through his Special Deputy, David B. Trefry, hereby submits the following authorities in line with the synopsis of the issue posted by the Supreme Court.

Whether a narcotics dog sniff of the defendant's vehicle following an investigatory stop constituted a search under article I, section 7 of the Washington Constitution, and if so, whether the search was lawful.

State Cases:

- State v. Kennedy, 107 Wn.2d 1, 726 P.2d 445 (1986)
- State v. Martinez, 136 Idaho 436, 34 P.3d 1119 (2001)
- State v. Wigginton, 142 Idaho 180, 125 P.3d 536 (2005)
- State v. Yeomans, 144 Idaho 871, 172 P.3d 1146 (2007)

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3 State v. Branch, 177 N.C. App. 104, 627 S.E.2d 506 (2006)

4 People v. Mayberry, 31 Cal.3d 335, 182 Cal. Rptr. 617, 644 P.2d 810 (1982)

5 State v. Carlson, 102 Ohio App.3d 585, 657 N.E.2d 591 (1995)

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7 Federal Cases:

8 Florida v. Royer, 460 U.S. 491, 103 S. Ct. 1319, 75 L. Ed. 2d 229 (1983)

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10 United States v. Diaz, 25 F.3d 392, (6th Cir. 1994)

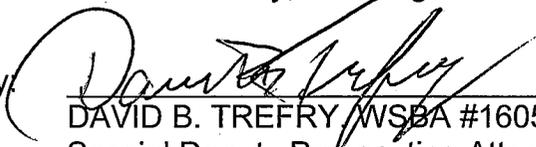
11 United States v. Lingenfelter, 997 F.2d 632, (9th Cir. 1993)

12 United States v. Ludwig, 10 F.3d 1523, 1527 (10th Cir. 1993)

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14 United States v. Williams, 69 F.3d 27, 28 (5th Cir. 1995) *cert. denied*,
116 S. Ct. 1284 (1996)

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16 Respectfully submitted this 9th day of May, 2008.

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18 TIMOTHY S. O'NEILL
19 Prosecuting Attorney
20 Klickitat County, Washington

21 By: 

22 DAVID B. TREFRY /WSBA #16050
23 Special Deputy Prosecuting Attorney
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