

RECEIVED *vic*
SUPREME COURT
STATE OF WASHINGTON
Jun 22, 2011, 2:40 pm
BY RONALD R. CARPENTER *E*
CLERK

Law Office of
ALSEPT & ELLIS, LLC
621 SW Morrison St., Suite 1025
Portland, OR 97205
206/218-7076 (phone) ❖ JeffreyErwinEllis@gmail.com

RECEIVED BY E-MAIL *lyh*

June 22, 2011

Clerk of the Court
Washington Supreme Court
via email

RE: STATE OF WASHINGTON V. WILLIAM BROUSSEAU, NO. 83415-6

Clerk of the Court:

Pursuant to RAP 10.8, Petitioner submits the following additional authorities:

United States v. Arenburg, __ F.Spp. __, 2011 WL 2421113 (W.D.N.Y. 2011) (passage of several years from trial to remand from appeal made retrospective competency hearing impossible).

United States v. Bergman, 599 F.3d 1142 (10th Cir. 2010) (In determining whether to order a retrospective competency hearing first factor to consider is passage of time. When court remands, trial court should first determine whether reliable competency hearing is even possible given passage of time. Dissent argues that passage of three years from time of trial and lack of evidence about competency at time of original proceeding make retrospective competency hearing impossible.)

Sincerely,

Jeff Ellis
Jeffrey Ellis
Attorney at Law

cc: Teresa Chen, DPA

ORIGINAL