

NO. 83743-1

SUPREME COURT
STATE OF WASHINGTON

DELBERT WILLIAMS, APPELLANT

v.

LEONE & KEEBLE, INC., RESPONDENT

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SUPREME COURT
STATE OF WASHINGTON
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STATEMENT OF ADDITIONAL AUTHORITIES

LAW OFFICES OF RICHARD McKINNEY

By: Richard McKinney, WSBA No. 4895
201 W. North River Drive, Suite 520
Spokane, Washington 99201
509/327-2539; Fax: 509/327-2504

I.

The following three cases pertain to the issue of whether the “first to file” rule applies to two tribunals which are in two different states.

- 1.1 *Townsend v. Rosenbaum*, 187 Wash. 372, 60 P.2d 251 (1936)
- 1.2 *Milwaukee Lumber Co. v. Superior Ct. of Washington In and For Spokane County*, 147 Wash. 615, 616, 266 P. 1054 (1928)
- 1.3 *Marcus v. Marcus*, 3 Wn. App. 370, 475 P.2d 571 (1970)

II.

The following case pertains to the issue as to whether an administrative decision by the Idaho Insurance Fund is a binding decision for res judicata purposes.

- 2.1 *Dominguez v. Evergreen Resources, Inc.*, 142 Idaho 7, 121 P.2d 938 (2005).

RESPECTFULLY SUBMITTED THIS 5th day of January, 2011.


RICHARD MCKINNEY, WSBA No. 4895

WASHINGTON STATE SUPREME COURT

DELBERT WILLIAMS,

APPELLANT

v.

LEONE & KEEBLE, INC.,

RESPONDENT

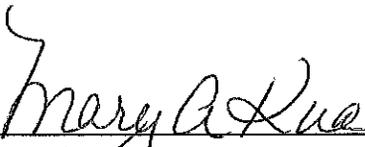
Washington Supreme Court
No. 83743-1

DECLARATION UNDER GR 17

Mary Rua makes the following Declaration under penalty of perjury under the laws of the State of Washington.

1. I am over the age of eighteen years and competent to testify to the matters stated herein, which are based on personal knowledge.
2. My place of business is the Law Office of Richard McKinney, 201 W. North River, Suite 520, Spokane, Washington 99201; 509/327-2539; fax: 509/327-2504.
3. I have examined the signature page of the Statement of Additional Authorities which is page 3 of this document totaling (5) pages including this Declaration, and determine it to be complete and legible and have confirmed the accuracy thereof telephonically.

EXECUTED in Spokane, Washington this 6th day of January, 2011.



Mary A. Rua

CERTIFICATE OF SERVICE

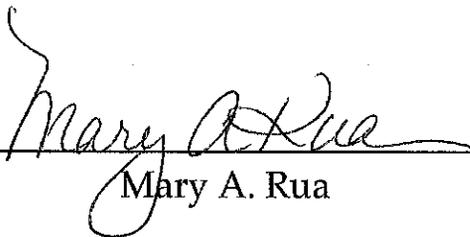
I hereby certify that on January 6th, 2011, the original and one (1) copy of the **Statement of Additional Authorities** were filed by mail with the Washington State Supreme Court, at the following address:

WASHINGTON STATE SUPREME COURT
Office of the Clerk
415 12th Avenue SW
PO Box 40929
Olympia, WA 98504-0929

In addition, I served one (1) copy of the **Statement of Additional Authorities**, via U.S. Mail, to the following:

Andrew C. Bohrsen
505 West Riverside Avenue, Suite 400
Spokane, Washington 99201

I certify under penalty of perjury, according to the laws of the State of Washington, that the foregoing is true and correct.



Mary A. Rua