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No. 87109-4

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

In re the Personal Restraint Petition of:

JERRY DALE LAIN,

Petitioner.

STATEMENT OF  
ADDITIONAL  
AUTHORITY

The Respondents, by and through their attorneys, ROBERT W. FERGUSON, Attorney General, NOAH G. PURCELL, Solicitor General, and JOHN J. SAMSON, Assistant Attorney General, respectfully submit this statement of additional authority. The following decision is relevant to the issue of the existence of a liberty interest in this case:

*Connecticut Board of Pardons, et al. v. Dumschat, et al.*,  
452 U.S. 458, 101 S. Ct. 2460, 69 L.Ed.2d 158 (1981)

DATED this 18th day of March, 2013.

Respectfully submitted,  
ROBERT W. FERGUSON  
Attorney General

*John J. Samson*

NOAH G. PURCELL, WSBA # 43492  
Solicitor General  
JOHN J. SAMSON, WSBA #22187  
Assistant Attorney General

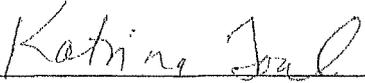
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**CERTIFICATE OF SERVICE**

I hereby certify that I caused to be electronically filed the foregoing document with the Clerk of the Court and certify that I have mailed by United States Postal Service the document to the following participant:

RICHARD ALAN LINN – WSBA #16795  
LAW OFFICE OF RICHARD LINN, PLLC  
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BELLEVUE, WA 98005-2509  
[linn@rlinnlaw.net](mailto:linn@rlinnlaw.net)

EXECUTED this 18th day of March, 2013, at Olympia, WA.

  
\_\_\_\_\_  
KATRINA TOAL  
Legal Assistant

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- PRP of Jerry Dale Lain
- 87109-4
- John J. Samson
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Thank you.

<<StatementAddAuthority.pdf>>

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**Legal Assistant**

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