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SUPREME COURT
STATE OF WASHINGTON
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NO. 87855-2

SUPREME COURT
OF THE STATE OF WASHINGTON

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STATE OF WASHINGTON,
Plaintiff-Respondent

PETITIONER'S STATEMENT OF
ADDITIONAL AUTHORITIES

v.

DAVID ALLEN WOOTEN, JR.,
Defendant-Petitioner

Under RAP 10.8, Petitioner David Allen Wooten, Jr. hereby submits the following additional authority, which bears on the issue of ownership of property (Issue No. 1 raised in Wooten's Petition for Review):

- *Ashford v. Reese*, 132 Wash. 649, 233 P. 29 (1925) (an executory contract of sale conveys no title or interest, either legal or equitable to vendee); *overruled by Cascade Security Bank v. Butler*, 88 Wn.2d 777, 567 P.2d 631 (1977);
- Definition of "ownership" per *Black's Law Dictionary* (9th ed. 2009): [t]he bundle of rights allowing one to use, manage, and enjoy property, including the right to convey it to others.

Respectfully submitted this 17th day of May, 2013.

_____/s/
Rita J. Griffith, WSBA No. 14360

_____/s/
Cynthia B. Jones, WSBA No. 38120

Attorneys for Appellant

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Rec'd 5-17-13

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From: jones.cynthiab@gmail.com [<mailto:jones.cynthiab@gmail.com>] **On Behalf Of** Cynthia Jones
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Please find attached Statement of Additional Authorities for State v. David Allen Wooten, Case No. 87855-2. Submitted by Cynthia B. Jones, WSBA 38120, (206)972-4943, cjones@joneslegalgroup.net

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Cynthia B. Jones
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