

87904-4

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON  
DIVISION ONE

STATE OF WASHINGTON,  
Respondent

v.

SAMUEL PIATNITSKY,  
Appellant.

No. 66442-5-I

STATEMENT OF  
ADDITIONAL  
AUTHORITIES (RAP 10.8)

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STATE OF WASHINGTON  
DIVISION ONE

Pursuant to RAP 10.8, appellant Samuel Piatnitsky submits the following statement of additional authorities (in addition to the authority cited May 7, 2012):

State v. Pierce, No. 40777-9-II (filed 7/17/12) (statement "I'm gonna need a lawyer because it wasn't me" was unequivocal invocation of right to an attorney, and the question of whether a statement was an unequivocal invocation of rights is a question of law reviewed de novo).

DATED this 17th day of July, 2012.

Respectfully submitted,

  
LILA J. SILVERSTEIN (38394)  
Attorney for Appellant

**DECLARATION OF FILING AND MAILING OR DELIVERY**

The undersigned certifies under penalty of perjury under the laws of the State of Washington that on the below date, the original of the document to which this declaration is affixed/attached, was filed in the **Court of Appeals - Division One** under Case No. **66442-5-1**, and a true copy was mailed with first-class postage prepaid or otherwise caused to be delivered to the following attorney(s) or party/parties of record at their regular office or residence address as listed on ACORDS:

- respondent Randi Austell, DPA  
King County Prosecutor's Office-Appellate Unit
- appellant
- Attorney for other party

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 STATE OF WASHINGTON

*ma*  
 MARIA ANA ARRANZA RILEY, Legal Assistant  
 Washington Appellate Project

Date: July 17, 2012