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IN THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,)	No. 88086-7
Respondent,)	
)	STATEMENT
v.)	OF ADDITIONAL
)	AUTHORITIES
ALLEN GREGORY,)	(RAP 10.8)
Appellant.)	

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Pursuant to RAP 10.8, appellant Allen Gregory submits the following statement of additional authorities: *Glossip v. Gross*, 576 U.S. ___ (No. 14-7955, filed 6/29/15) (Breyer, J., dissenting):

In 1976, the Court thought that the constitutional infirmities in the death penalty could be healed; ... Almost 40 years of studies, surveys, and experience strongly indicate, however, that this effort has failed.

Id. at 2. See also *id.* at 9-17 (explaining that death penalty is imposed arbitrarily and based on race and geography rather than egregiousness of the crime); *id.* at 37-38 (citing Governor Inslee's moratorium and the American Law Institute's withdrawal of the model penal code); *id.* at 40 (noting it is the responsibility of the judiciary to enforce the Eighth Amendment).

Respectfully submitted this 16th day of July, 2015.

s/ Lila J. Silverstein
s/ Neil M. Fox
LILA J. SILVERSTEIN (38394)
NEIL M. FOX (15277)
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Statement of Additional Authorities

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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 **Washington State Supreme Court** under **Case No. 88086-7**, 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 Kathleen Proctor, DPA; John Neeb, DPA
[PCpatcecf@co.pierce.wa.us]
Pierce County Prosecutor's Office
- appellant
- Attorney for other party



MARIA ANA ARRANZA RILEY, Legal Assistant
Washington Appellate Project

Date: July 16, 2015

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Statement of Additional Authorities

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