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No. 88307-6

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IN THE SUPREME COURT
OF THE STATE OF WASHINGTON

Court of Appeals No. 30098-6-III

RODOLFO ANAYA-GOMEZ,
as personal representative of the estate of Christina Palma-Anaya,
deceased,

Petitioner,

v.

MARK F. SAUERWEIN, M.D. and THE YAKIMA VALLEY FARM
WORKERS CLINIC, a Washington corporation,

Respondents.

**PETITIONER'S SECOND STATEMENT
OF ADDITIONAL AUTHORITY**

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 ORIGINAL

In accordance with RAP 10.8, Petitioner Rodolfo Anaya submits additional authority bearing on the following subject:

A. The meaning of RCW 7.70.050's undefined phrase, "relating to the treatment," discussed in briefing (Pet'r's Supplemental Br. at 19; Resp't's Supplemental Br. at 14-15; Wash. State Ass'n for Justice Found. Amicus Br. at 10 & n.6; Pet'r's Answer to Wash. State Ass'n for Justice Found. Amicus Br. at 6-7; Resp't's Answer to Wash. State Ass'n for Justice Found Amicus Br. at 10-11) and at oral argument (e.g., 23:45, McCloud, J.):

- *Caughell v. Grp. Health Co-op. of Puget Sound*, 124 Wn.2d 217, 233, 876 P.2d 898 (1994) (in a case about the "continuing negligent treatment" rule under the medical malpractice statute of limitations, RCW 4.16.350, the Court defined a health care provider's "treatment" as "the protocol, procedures, prescriptions, or other medical actions ordered or performed by the health care provider").

Respectfully submitted this November 5, 2013.

KELLER ROHRBACK L.L.P.



Ian S. Birk, WSBA #31431
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Attorneys for Petitioner

CERTIFICATE OF SERVICE

I certify under penalty of perjury of the laws of the State of Washington that on November 5, 2013, I caused a true and correct copy of the foregoing PETITIONER'S SECOND STATEMENT OF ADDITIONAL AUTHORITY to be delivered via email and U.S. Mail postage prepaid.

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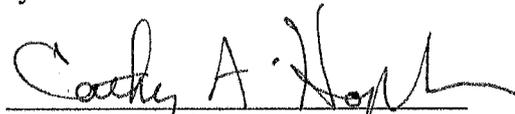
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Clerk of the Court,

Case Name: Anaya-Gomez v. Mark F. Sauerwein, M.D. and The Yakima Valley Farm Workers Clinic
No. 88307-6

Attached for filing is Petitioner's 2nd Statement of Additional Authority.

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