

RECEIVED VSC
SUPREME COURT
STATE OF WASHINGTON
May 11, 2015, 10:14 am
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SUPREME COURT
OF THE STATE OF WASHINGTON

RECEIVED BY E-MAIL

AUTOMOTIVE UNITED TRADES
ORGANIZATION,

Appellant,

v.

The STATE OF WASHINGTON; JAY
INSLEE, in his official capacity as
Governor of the State of Washington;
PAT KOHLER, in her official capacity
as Director of the Washington State
Department of Licensing,

Respondents.

No. 89734-4

STATEMENT OF
ADDITIONAL
AUTHORITIES

COMES NOW appellant Automotive United Trades Organization
and submits the following additional authorities to the Court pursuant to
RAP 10.8:

- *Becerra v. Expert Janitorial, LLC*, 181 Wn.2d 186, 194, 332 P.3d 415 (2014) (Court on review of summary judgment must construe the evidence in a light most favorable to the non-moving party);
- *State v. Barton*, 181 Wn.2d 148, 154-55, 331 P.3d 50 (2014) (Courts presume constitutional language carries its ordinary and popular meaning, looking to the right as it existed when the constitutional provision was adopted);
- *Wash. Water Jet Workers Ass'n v. Yarbrough*, 151 Wn.2d 470, 477, 90 P.3d 42 (2004) (Courts may look to historical context of constitutional provision, its framers' intent, and contemporaneous events and proceedings in interpreting it);
- *West v. Dep't of Licensing*, 182 Wn. App. 500, 331 P.3d 72, review denied, 339 P.3d 634 (2014) (amounts of "refund" payments to

Statement of Additional Authorities - 1

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Seattle, Washington 98126
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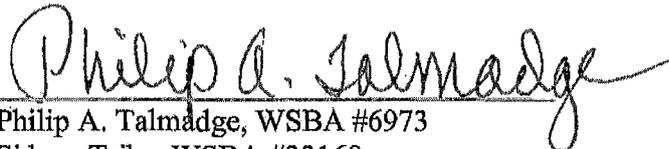


ORIGINAL

tribes and underlying documentation of payments exempt under PRA).

DATED this 14 day of May, 2015.

Respectfully submitted,



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Sidney Tribe, WSBA #33160
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Attorneys for Appellant Automotive United
Trades Organization

DECLARATION OF SERVICE

On said day below, I emailed a courtesy copy and deposited with the U.S. Postal Service a true and accurate copy of the Statement of Additional Authorities in Supreme Court cause number 89734-4 to the following:

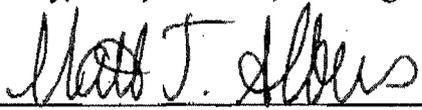
<p>Eric Mentzer Alicia O. Young Assistant Attorney General PO Box 40126 Olympia, WA 98504-0126 ericm@atg.wa.gov alicia.young@atg.wa.gov</p>	<p>Rene D. Tomisser Senior Counsel, Atty Gen. of Wash. Torts Division PO Box 40126 Olympia, WA 98504-0126 renet@atg.wa.gov</p>
<p>Paul J. Lawrence Matthew J. Segal Pacifica Law Group LLP 1191 Second Avenue, Suite 2100 Seattle, WA 98101 paul.lawrence@pacificallawgroup.com matthew.segal@pacificallawgroup.com</p>	<p>Harry J.F. Korrell Joseph P. Hoag Davis Wright Tremaine LLP 1201 Third Avenue, Suite 2200 Seattle, WA 98101-3045 harrykorrell@dwt.com</p>
<p>John C. Sledd Cory J. Albright Kanji & Katzen, PLLC 401 Second Ave. S., Suite 700 Seattle, WA 98104 calbright@kanjikatzen.com</p>	<p>Aubrey A. Seffernick Briana Coyle Jones Miller Nash Graham & Dunn LLP 2801 Alaskan Way, Suite 300 Seattle, WA 98121 aubrey.seffernick@millernash.com Brie.Coyle@millernash.com</p>
<p>Kelly S. Croman Director, Office of Tribal Attorney Confederated Tribes of the Chehalis Reservation 420 Howanut Road P.O. Box 536 Oakville, WA 98568 Sent by U.S. mail only</p>	<p>Fabio Apolito Office of the Tribal Attorney Nisqually Indian Tribe 4820 She-Nah-Num Drive SE Olympia, WA 98513 apolito.fabio@nisqually-nsn.gov</p>

<p>John Howard Bell Law Office, Puyallup Indian Tribe 3009 E. Portland Ave. Tacoma, WA 98404 john.bell@puyalluptribe.com</p>	<p>Earle David Lees Skokomish Tribal Attorney's Office Skokomish Indian Tribe N. 80 Tribal Center Rd. Skokomish Nation, WA 98584 lees@nelson-lees.com</p>
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<p>Bruce Didesch Didesch & Associates P.O. Box 1076 Mead, WA 99021 Sent by U.S. mail only</p>	

Original E-filed with:
Washington Supreme Court
Clerk's Office

I declare under penalty of perjury under the laws of the State of Washington and the United States that the foregoing is true and correct.

DATED this 11th day of May, 2015, at Seattle, Washington.



Matt J. Albers, Legal Assistant
Talmadge/Fitzpatrick/Tribe

OFFICE RECEPTIONIST, CLERK

To: Matt Albers
Cc: ericm@atg.wa.gov; alicia.young@atg.wa.gov; renet@atg.wa.gov; paul.lawrence@pacificallawgroup.com; matthew.segal@pacificallawgroup.com; harrykorrell@dwt.com; calbright@kanjikatzen.com; aubrey.seffernick@millernash.com; Brie.Coyle@millernash.com; apolito.fabio@nisqually-nsn.gov; john.bell@puyalluptribe.com; lees@nelson-lees.com; smannakee@stillaguamish.com; pateus@aol.com; dhawkins@upperskagit.com; scottwheat@icloud.com
Subject: RE: Automotive United Trades Organization v. The State of Washington, et al.

Received 5-11-2015

Supreme Court Clerk's Office

Please note that any pleading filed as an attachment to e-mail will be treated as the original. Therefore, if a filing is by e-mail attachment, it is not necessary to mail to the court the original of the document.

From: Matt Albers [mailto:Matt@tal-fitzlaw.com]
Sent: Monday, May 11, 2015 10:13 AM
To: OFFICE RECEPTIONIST, CLERK
Cc: ericm@atg.wa.gov; alicia.young@atg.wa.gov; renet@atg.wa.gov; paul.lawrence@pacificallawgroup.com; matthew.segal@pacificallawgroup.com; harrykorrell@dwt.com; calbright@kanjikatzen.com; aubrey.seffernick@millernash.com; Brie.Coyle@millernash.com; apolito.fabio@nisqually-nsn.gov; john.bell@puyalluptribe.com; lees@nelson-lees.com; smannakee@stillaguamish.com; pateus@aol.com; dhawkins@upperskagit.com; scottwheat@icloud.com
Subject: Automotive United Trades Organization v. The State of Washington, et al.

Good morning,

Attached please find the following document for filing with the Court:

Document to be filed: Statement of Additional Authorities.

Case Name: Automotive United Trades Organization v. The State of Washington, et al.

Case Cause Number: 89734-4

Attorneys Names and WSBA#s: Philip A. Talmadge, WSBA #6973 and Sidney Tribe, WSBA #33160 of Talmadge/Fitzpatrick/Tribe

Contact information: Matt J. Albers, (206) 574-6661, matt@tal-fitzlaw.com

If you have any questions, please feel free to contact me. Thank you!

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