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SUPREME COURT
STATE OF WASHINGTON
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No. 90068-0

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IN THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON
Petitioner

v.

RYAN PEELER
Respondent.

ON APPEAL FROM THE SUPERIOR COURT OF THE STATE OF
WASHINGTON FOR SKAGIT COUNTY

BRIEF OF AMICUS
WASHINGTON ASSOCIATION OF CRIMINAL DEFENSE
LAWYERS

Suzanne Lee Elliott, WSBA 12634
Co-Chair Amicus Committee
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ORIGINAL

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**I.
ARGUMENT**

On December 10, 2014, this Court invited the Washington Association of Criminal Defense Lawyers to file an amicus brief in this case. WACDL relies upon the availability of volunteer lawyers to author amicus briefs on the Association's behalf. Given the short time between this Court's invitation to file the brief and the due date, the Association was unable to locate a volunteer who had sufficient time to draft a comprehensive brief on the Intrastate Detainer Act. Nonetheless, after reading the unpublished decision of the Court of Appeals and the supplemental briefs filed by the parties, the Washington Association of Criminal Defense Lawyers urges this Court to affirm the unpublished decision of the Washington State Court of Appeals. We note that Peeler's supplemental brief, filed on November 19, 2014, fully explains why the appellate court's statutory interpretation is correct.

Requiring the strict compliance with the Intrastate Detainer Act enhances the timely and fair resolution of cases for both parties and the public. The purpose of the Act is to encourage the expeditious and orderly disposition of pending charges despite the incarceration of the defendant in the DOC. The Act comports with Wash. Const. art. I, § 10's command that justice be administered without "unnecessary delay." The State's

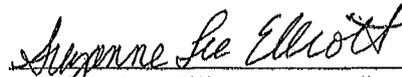
arguments for ignoring the plain language of the statute would contribute to unnecessary delay and would insert unnecessary ambiguity in the processing of demands for adjudication of the pending charge based solely upon the location of the defendant at the time the local prosecutor receives the demand. This Court should reject these arguments because they do not serve the public's interest clear procedures for the timely resolution of pending criminal cases.

II. CONCLUSION

This Court should reject the State's arguments and affirm the well-reasoned decision by the Court of Appeals.

DATED this 30th day of December, 2014.

Respectfully submitted,



Suzanne Lee Elliott, WSBA #12634
Attorney for Amicus Washington Association
of Criminal Defense Lawyers

CERTIFICATE OF SERVICE

I certify that on the date listed below, I served by U.S. Mail, postage prepaid, one copy of the foregoing pleading on the following:

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12 | 30 | 2014
Date


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Dear Sir/Madame:

Enclosed for filing with the Washington State Supreme Court *in State of Washington v. Ryan Peeler*, Supreme Court No. 90068-0, is the Brief of *Amicus* Washington Association of Criminal Defense Lawyers.

Feel free to contact me with any questions or concerns.

Thank you for your kind consideration to this matter.

Best,

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