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SUPREME COURT
STATE OF WASHINGTON
May 18, 2015, 1:25 pm
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IN THE SUPREME COURT OF WASHINGTON

In re Adoption of MSMP, A.K. and S.K., Respondents,)	
)	
)	No. 90467-7
)	
vs.)	
)	
N.P.,)	PETITIONER'S STATEMENT
Petitioner.)	OF ADDITIONAL AUTHORITY
_____)	

Pursuant to RAP 10.8, petitioner cites to the following additional authority on the identified issues:

In re Termination of Parental Rights to Torrance P., Jr., 298 Wis.2d 1, 28-29, 724 N.W.2d 623 (2006) (on the question whether structural error analysis applies to the denial of the statutory right to counsel in parental right termination proceeding), cited by this Court in In re Detention of D.F.F., 172 Wn.2d 37, 43, 256 P.3d 357, 361 (2011);

In re Welfare of G.E., 116 Wn. App. 326, 338, 65 P.3d 1219 (2003) (on the question whether denial of the right to counsel is



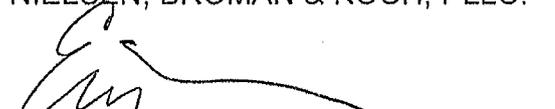
reversible error without analysis of prejudice), cf. 116 Wn. App at 344 (Hunt, J., dissenting) (discussing the dissent's view that the error was not prejudicial);

People ex rel. R.D., 2012 COA 35, 277 P.3d 889, 895-97 (Colo. App. 2012) (on the question whether denial of the right to counsel is "automatic reversible error", rather than "structural error", requiring reversal of an order terminating parental rights);

In re Adoption of B.J.M., 42 Kan. App. 2d 77, 87-88, 209 P.3d 200, 207 (2009) (discussing the difference between "structural error" and "automatic reversible error" in the context of a termination proceeding where father was denied due process right to be heard at a meaningful time and in a meaningful manner).

DATED this 18th day of May, 2015.

Respectfully Submitted,
NIELSEN, BROMAN & KOCH, PLLC.



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OID No. 91051
Attorneys for Petitioner

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To: Eric Broman
Cc: Wayno, Carrie Hoon (ATG); Chafin, Cheryl (ATG); lirhus@lk-legal.com; keck@lk-legal.com
Subject: RE: Supreme Ct. No. 90467-7, In re the Adoption of M.S.M.-P.

Received 5/18/15

From: Eric Broman [mailto:BromanE@nwattorney.net]
Sent: Monday, May 18, 2015 1:25 PM
To: OFFICE RECEPTIONIST, CLERK
Cc: Wayno, Carrie Hoon (ATG); Chafin, Cheryl (ATG); lirhus@lk-legal.com; keck@lk-legal.com
Subject: RE: Supreme Ct. No. 90467-7, In re the Adoption of M.S.M.-P.

Dear Supreme Court Clerk:

Attached for filing is petitioner's statement of additional authority. A copy has been served on all counsel of record by attachment to this email.

The case is set for argument as the third case on May 19. Copies of the cited cases have also been sent to counsel as a courtesy. Thank you for your consideration and assistance.

Eric Broman
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