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NO. 91846-5

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**WASHINGTON STATE SUPREME COURT**

**HEIDI KROEBER a/k/a HEIDI LAZENBY**

**v.**

**GEICO INSURANCE COMPANY**

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**Statement of Additional Authorities**

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LAW OFFICES OF RICHARD MCKINNEY

By: Richard McKinney, WSBA No. 4895  
2701 California Avenue SW, #225  
Seattle, WA 98116  
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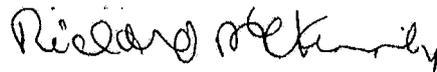
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1. *Transamerica Ins. Group v. United Pacific Ins. Co.*, 92 Wn.2d 21, 593 P.2d 156 (1979) at n.3 approvingly cites *Haser v. Maryland Cas. Co.*, 78 N.D. 893, 53 N.W.2d 508 (1952) (facts of underlying incident are recited in *Haser v. Pape*, 77 N.D. 36, 39 N.W.2d 578 (1949)). This case finds insurance coverage for cab company, which did not act intentionally, when its driver used cab by transporting passenger against her will to a location where driver raped her.

DATED this 8<sup>th</sup> day of September, 2015.

Respectfully submitted,



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RICHARD MCKINNEY, WSBA NO. 4895  
Attorney for Heidi Kroeber

**CERTIFICATE OF SERVICE**

I hereby certify that on September 8, 2015, one (1) copy of the **Statement of Additional Authorities** was mailed via Regular Mail to the following individual:

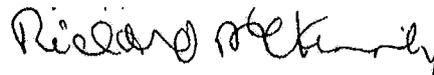
Alfred E. Donohue, WSBA #32774  
Wilson Smith Cochran Dickerson  
901 Fifth Avenue, Suite 1700  
Seattle, WA 98164

I hereby certify that on September 8, 2015, one (1) copy of the **Statement of Additional Authorities** was emailed to the following:

EMAIL – [supreme@courts.wa.gov](mailto:supreme@courts.wa.gov)  
Washington Supreme Court  
P.O. Box 40929  
Olympia, WA 98504-0929

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

EXECUTED at Bremerton, Washington this 8<sup>th</sup> day of September, 2015.



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RICHARD MCKINNEY, WSBA NO. 4895  
Attorney for Heidi Kroeber

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Enclosed find first statement of additional authorities of Heidi Kroeber.

Richard McKinney