

NO. 92398-1

SUPREME COURT OF THE
STATE OF WASHINGTON

RECEIVED BY E-MAIL *bj*

DOT FOODS, INC.,

Respondent,

v.

DEPARTMENT OF REVENUE OF
THE STATE OF WASHINGTON,

Appellant.

DEPARTMENT OF
REVENUE'S STATEMENT
OF ADDITIONAL
AUTHORITIES

Appellant, Department of Revenue, pursuant to RAP 10.8, submits the following additional authority for the Court's consideration regarding Dot Food's argument at pages 33 through 35 of its Response Brief and Brief on Cross-Appeal ("Response Brief") that *In re Estate of Hambleton* should be overruled or narrowed, and its arguments at pages 45-48 of its Response Brief and pages 22-25 of its Reply Brief on Cross-Appeal involving the separation of powers doctrine:

- *Hambleton v. Washington Dep't of Revenue*, ___ S. Ct. ___, 2015 WL 3534450 (Oct. 13, 2015) (mem.) ("The petition for writ of certiorari is denied.")
- *Gillette Commercial Operations N. Am. & Subsidiaries v. Dep't of Treasury*, ___ NW 2d ___, 2015 WL 5704567 (Mich. Ct. App. 2015) (upholding retroactive rescission of state's membership in Multistate Tax Compact against due process and separation of powers challenges).

 ORIGINAL

RESPECTFULLY SUBMITTED this 10th day of November,
2015.

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Attorney General



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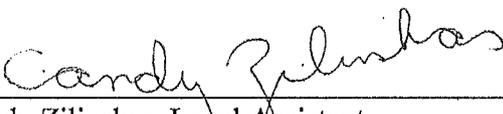
PROOF OF SERVICE

I certify that I served a true and correct copy of this motion via electronic mail, per agreement, on the following:

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

DATED this 10th day of November, 2015, at Tumwater, WA.



Candy Zilinskas, Legal Assistant

OFFICE RECEPTIONIST, CLERK

To: Zilinskas, Candy (ATG)
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Subject: DOT Foods, Inc. v. Department of Revenue, No. 92398-1

Please file the attached Department of Revenue's Statement of Additional Authorities. Thank you.