

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,  Respondent,  v.  JOEL RODRIGUEZ RAMOS,  Appellant,	NO. 92454-6  STATEMENT OF ADDITIONAL AUTHORITIES (RAP 10.8)
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COMES NOW the respondent, State of Washington, by and through its attorney GRETCHEN E. VERHOEF, and respectfully requests that the Court consider the following additional authority pursuant to RAP 10.8:

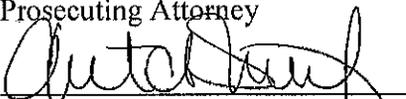
***Walle v. State*, No. SC12-2333, 2016 WL 5165165 (Fla. Sept. 21, 2016).**

The State previously cited to *Walle v. State*, 99 So.3d 967 (Fla. 2012), on page four of its response to the Brief of Amici ACLU et al., as one example of a decision in which another state court declined to extend the holding of *Graham v. Florida*, 560 U.S. 48, 130 S.Ct. 2011, 176 L.Ed.2d 825 (2010), to an aggregate sentence of 92 years.

This decision was reversed by *Walle v. State*, No. SC12-2333, 2016 WL 5165165, wherein the Supreme Court of Florida quashed district court's decision, and remanded for resentencing, citing *Henry v. State*, 175 So.3d 675 (Fla. 2015) and *Gridine v. State*, 175 So.3d 672 (Fla. 2015), cases in which 90-year and 75-year sentences, respectively, were deemed unconstitutional for juveniles convicted of non-homicide offenses.

Dated this 13 day of October 2016.

JOSEPH BRUSIC  
Prosecuting Attorney



Gretchen E. Verhoef #37938  
Deputy Prosecuting Attorney  
Attorney for Respondent

ORIGINAL

**CERTIFICATE OF SERVICE**

I certify under penalty of perjury under the laws of the State of Washington, that on October 13, 2016, I e-mailed a copy of the Statement of Additional Authorities in this matter, pursuant to the parties' agreement, to:

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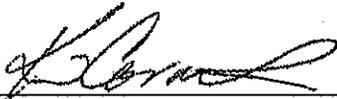
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(Date)

Spokane, WA  
(Place)

  
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(Signature)

# SPOKANE COUNTY PROSECUTOR

October 13, 2016 - 11:05 AM

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