

FILED
SUPREME COURT
STATE OF WASHINGTON
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SUPREME COURT
OF THE STATE OF WASHINGTON

HBH; SAH; and TREY HAMRICK,
litigation guardian ad litem on behalf of
KEH, JBH, and KMH,

Respondents,

v.

STATE OF WASHINGTON,

Petitioner,

and

TOWN OF EATONVILLE,

Defendants.

No. 94529-2

STATEMENT OF
ADDITIONAL
AUTHORITIES

COME NOW respondents HBH, SAH, and Trey Hamrick, litigation guardian ad litem on behalf of KEH, JBH, and KMH (collectively "Hamrick") and they submit the following additional authorities to the Court pursuant to RAP 10.8 in response to specific factual questions during the February 22, 2018 oral argument:

- complaint in Pierce Cty. Cause No. 12-2-07320-7 (consolidated with Cause No. 11-2-15110-2) specifically pleaded in ¶¶ 22-23 negligent placement of girls in Hamrick home and continuing duty of DSHS);

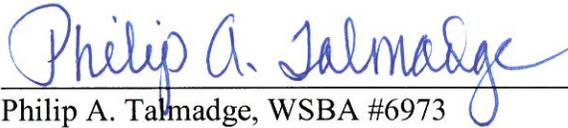
Statement of
Additional Authorities - 1

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- CP 240-41 (Barbara Stone’s opinion that DSHS health and safety visits for the girls were “vital”);
- CP 269 (SAH testified: “According to DSHS policy I was shown, a caseworker should have asked me on at least twelve (12) different occasions whether or not I felt safe or there were problems in the home. *If I were asked these questions in a safe place, I would have disclosed that Scott Hamrick was touching me inappropriately and that Drew Anne Hamrick was being abusive towards me.* (Emphasis added);
- CP 277-278 (DSHS policy requiring face-to-face meetings between children in out-of-home placement and caseworkers, including specific inquiries of the children).

DATED this 22^d day of February, 2018.

Respectfully submitted,



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guardian ad litem on behalf of KEH, JBH,
and KMH

DECLARATION OF SERVICE

On said day below, I electronically served a true and accurate copy of the *Statement of Additional Authorities* in Supreme Court Cause No. 94529-2 to the following parties:

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Original e-filed with:
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Clerk's Office

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

DATED: February 22, 2018, at Seattle, Washington.



Brendon P. McCarroll, Legal Assistant
Talmadge/Fitzpatrick/Tribe

TALMADGE/FITZPATRICK/TRIBE

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Transmittal Information

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