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

CESAR BELTRAN-SERRANO, an  
incapacitated person, individually, and  
BIANCA BELTRAN as guardian *ad litem*  
of the person and estate of CESAR  
BELTRAN-SERRANO,

Appellants,

vs.

CITY OF TACOMA, a political  
subdivision of the State of Washington,

Respondent.

No. 95062-8

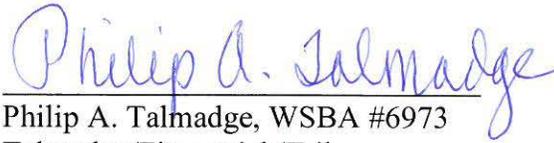
SECOND  
STATEMENT OF  
ADDITIONAL  
AUTHORITIES

COME NOW appellants who submit the following additional  
authorities to the Court pursuant to RAP 10.8:

- Laws of 2019, ch. 1, § 2(2) (noting that a law enforcement officer, performing the many duties entrusted to them, has “the solemn duty to preserve the life of persons with whom officers come in direct contact.”);
- *Id.* at § 3(4) (The Legislature determines that a law enforcement officer is not criminally liable for using deadly force if the use of such force is in “good faith,” defining that term as “an objective standard which shall consider all the facts, circumstances, and information known to the officer at the time to determine whether a similarly situated reasonable officer would have believed that the use of deadly force was necessary to prevent death or serious physical harm to the officer or another individual.”).

DATED this 4<sup>th</sup> day of February, 2019.

Respectfully submitted,



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DECLARATION OF SERVICE

On said day below, I electronically served a true and accurate copy of the *Second Statement of Additional Authorities* in Supreme Court Cause No. 95062-8 to the following parties:

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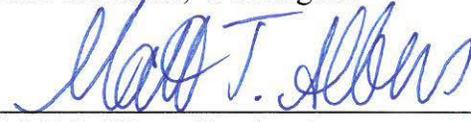
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Original E-filed with:  
Washington Supreme Court  
Clerk's Office

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 5, 2019 at Seattle, Washington.



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Matt J. Albers, Paralegal  
Talmadge/Fitzpatrick/Tribe

**TALMADGE/FITZPATRICK/TRIBE**

**February 05, 2019 - 12:20 PM**

**Transmittal Information**

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**Appellate Court Case Number:** 95062-8  
**Appellate Court Case Title:** Cesar Beltran-Serrano v. City of Tacoma  
**Superior Court Case Number:** 15-2-11618-1

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**Comments:**

Second Statement of Additional Authorities

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