

FILED
SUPREME COURT
STATE OF WASHINGTON
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IN THE WASHINGTON SUPREME COURT

STATE OF WASHINGTON,)	
)	No. 96873-0
Respondent,)	
)	SECOND
v.)	STATEMENT OF
)	ADDITIONAL
SHANNON BLAKE,)	AUTHORITIES
)	
Petitioner.)	

Under RAP 10.8, Shannon Blake submits the following additional authorities for this Court’s consideration:

Bostock v. Clayton County, Georgia, No. 17-1618, slip op. at 20, 2020 WL 3146686 (U.S. June 15, 2020) (“speculation about why a later Congress declined to adopt new legislation offers a ‘particularly dangerous’ basis on which to rest an interpretation of an existing law a different and earlier Congress did adopt”) (quoting Pension Ben. Guar. Corp. v. LTV Corp., 496 U.S. 633, 650, 110 S. Ct. 2668, 110 L. Ed. 2d 579 (1990));

Id. at 24 (“legislative history can never defeat unambiguous statutory text”).

Respectfully submitted this 15th day of June, 2020.



Richard W. Lechich – WSBA #43296
Washington Appellate Project – #91052
Attorney for Petitioner

DECLARATION OF FILING AND MAILING OR DELIVERY

The undersigned certifies under penalty of perjury under the laws of the State of Washington that on the below date, the original of the document to which this declaration is affixed/attached, was filed in the **Washington State Supreme Court** under **Case No. 96873-0**, and a true copy was mailed with first-class postage prepaid or otherwise caused to be delivered to the following attorney(s) or party/parties of record at their regular office or residence address as listed on ACORDS:

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Date: June 15, 2020

WASHINGTON APPELLATE PROJECT

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