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

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STATE OF WASHINGTON,	)	No. 96894-2
Respondent,	)	
	)	STATEMENT OF
v.	)	ADDITIONAL
	)	AUTHORITIES
M.S.,	)	(RAP 10.8)
Petitioner.	)	

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Pursuant to RAP 10.8, petitioner M.S. submits the following statement of additional authorities for the consideration of the Court in the above-captioned matter:

*State v. Hugdahl*, 195 Wn.2d 319, 458 P.3d 760 (2020)  
(recognizing “Prosecutors must set forth their intent to seek enhanced penalties in the information” and, “Sentencing enhancements must be alleged in the information because they increase the sentence beyond the prescribed statutory maximum”).

DATED this 14th day of September 2020.

Respectfully submitted,



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- respondent James Whisman, DPA  
[Jim.Whisman@kingcounty.gov]  
[PAOAppellateUnitMail@kingcounty.gov]  
King County Prosecutor's Office-Appellate Unit
- petitioner



MARIA ANA ARRANZA RILEY, Legal Assistant      Date: September 14, 2020  
Washington Appellate Project

# WASHINGTON APPELLATE PROJECT

September 14, 2020 - 4:28 PM

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**Appellate Court Case Number:** 96894-2  
**Appellate Court Case Title:** State of Washington v. M.S.

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