

67142-1

67142-1

NO. 67142-1-I

COURT OF APPEALS OF THE STATE OF WASHINGTON

DIVISION I

STATE OF WASHINGTON,

Respondent,

v.

RANDALL CONNOR,

Appellant.

2012 AUG -8 PM 3:23
COURT OF APPEALS
STATE OF WASHINGTON

APPEAL FROM THE SUPERIOR COURT FOR KING COUNTY

THE HONORABLE SHARON ARMSTRONG

BRIEF OF RESPONDENT

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A. ISSUE PRESENTED

Evidence is sufficient to support a conviction if, after viewing the evidence in the light most favorable to the State, any rational trier of fact could have found the essential elements of the crime proved beyond a reasonable doubt. The crime of murder in the first degree requires that the defendant acted with premeditated intent. Premeditation is proved by direct or circumstantial evidence showing that the defendant formed and reflected on his intent to kill, for however short a period of time. Here, substantial evidence demonstrated that Connor beat, tortured, and finally stabbed his girlfriend to death over a significant period of time, during which the victim changed out of blood-spattered clothes, engaged in sexual intercourse (voluntarily or not) with him, and then dressed in new clothing. No evidence presented to the jury suggested that this vicious, extended crime was the result of any immediate provocation, and no evidence suggests that Connor acted in a sudden, impulsive rage. Connor admitted that he had multiple motives when he murdered the victim, including sexual jealousy and fear that the victim would "snitch" on him to law enforcement. Under the circumstances, could a reasonable trier of fact conclude that Connor acted with premeditation?

B. FACTS OF THE CASE

1. PROCEDURAL FACTS

The appellant, Randall Connor, was charged by information with one count of murder in the first degree. CP 1. Connor was accused of killing Merianne Lorentson with premeditated intent on March 7, 2007. CP 1. By jury verdict rendered on April 14, 2011, Connor was found guilty as charged. CP 159.

On May 11, 2011, the trial court entered judgment on Connor and imposed on him a sentence of 388 months, the high end of the standard range. CP 160-68.

2. FACTS OF THE CASE

On the evening of March 7, 2007, Stan Muller planned to meet his good friend, Merianne Lorentson, at a skating rink near Ms. Lorentson's apartment in Kent. 15RP 42.¹ Lorentson failed to arrive at the rink, and Muller spent the next two days trying without success to reach her both by phone and by visiting her apartment complex, the Village Green Apartments. 15RP 43-44.

¹ See Appendix A for identification of volume numbers of verbatim report of proceedings and corresponding "RP" designation.

On the morning of Friday, March 9, 2007, Muller phoned Douglas Baird, the manager of the Village Green Apartments, and asked if he would check Lorentson's apartment to make sure she was all right. 15RP 46, 74-75. Baird, joined by two of the complex's maintenance workers, went to Lorentson's apartment and knocked on her front door. 15RP 76. Receiving no response, Baird put his master key into the front door lock; discovering that the door was in fact unlocked, he and the maintenance workers walked inside. 15RP 76-77. They found Lorentson's body lying on the floor of the living room. 15RP 77. Her face was covered by a pillow, and there was blood "all over." 15RP 102. Maintenance worker James Baker lifted the pillow, and the men could see numerous stab wounds on Lorentson's body. 15RP 102, 125.

Baird and the maintenance workers checked to see if Lorentson's then-five-year-old daughter, Jade, was also in the apartment, but she was not. 15RP 102. Baird then went immediately to his office and phoned for police and emergency medical assistance. 15RP 77.

Along with investigators from the Kent Police Department, Natasha Pranger, of the Washington State Patrol Crime Laboratory's crime scene response team, arrived at Lorentson's

apartment to process the scene. 17RP 14, 27-28. Pranger, who has been trained in bloodstain pattern analysis, concluded from the bloodstains at the scene that Lorentson moved or was moved a number of times after she began to bleed. 17RP 9-10, 35-37, 42. Pranger found a pair of Lorentson's sweatpants in the apartment's bathroom that had bloodstains in the crotch area; the bloodstains suggest that Lorentson was seated when the blood was deposited. 17RP 57-59, 71. She also found a white t-shirt of Lorentson's in the bathroom sink, which had significant bloodstains around the collar, though the shirt itself was not marred by cuts or knife-related defects. 17RP 80. On the soles of a pair of Lorentson's white shoes, also found in the bathroom, Pranger found stains that appeared to be the result of stepping on blood on the floor. 17RP 65.

Lorentson was wearing a black t-shirt, gray pants, and black sneakers when her body was discovered. 17RP 40. The black shirt and gray pants were saturated with blood, and the shirt was torn in areas that corresponded to cuts on Lorentson's torso and back. 17RP 79.

Pranger testified that, based on her analysis of the bloodstain and clothing evidence, Lorentson initially received lesser

but nonetheless blood-letting injuries while dressed in the white shirt and sweatpants, and that she removed those clothes and then put on the darker clothing she was found in. 17RP 83. Lorentson received the majority of all of her stabbing wounds while wearing those darker clothes. 17RP 84.

Pranger added that the bloodstains found on and around a chair in the living room suggest that Lorentson was in various positions – sitting in the chair, kneeling on it, bent over it – while she was being stabbed. 17RP 84-85.

King County Associate Medical Examiner Aldo Fusaro supervised Lorentson's autopsy. 30RP 45, 58. Lorentson had a laceration above her eyes and a contusion at the bridge of her nose, both the product of blunt force. 30RP 71-73. Fusaro and his intern noted blunt force-caused bruises on Lorentson's chest and neck, near her right ear. 30RP 97-98.

Lorentson had also sustained 34 stabbing and/or cutting wounds. 30RP 75-104. 30 of those wounds were concentrated around Lorentson's neck. 30RP 75-96. Fusaro described many of the injuries as "superficial," insofar as they either appeared to be the product of slicing as opposed to stabbing, or were stab wounds that did not penetrate beyond subcutaneous tissue. 30RP 75-96.

However, at least three injuries to Lorentson's neck were extremely severe. One stab wound on the right side of Lorentson's neck was the product of a blade penetrating her neck muscles, severing her right carotid artery and jugular vein, and continuing into her trachea and esophagus. 30RP 77. Another wound in the same area not only punctured Lorentson's neck muscles, but her left lung as well. 30RP 78. Lorentson also sustained a stab wound on the left side of her neck that penetrated both her left carotid artery and corresponding jugular vein. 30RP 85.

The medical examiners also found four stab wounds on Lorentson's torso. Two chest injuries were the result of a blade being plunged through Lorentson's rib cage, perforating her left lung. 30RP 99-102. She was also stabbed in the back by a blade that traveled four inches into her body, damaging two lumbar vertebrae and incising her left renal vein. 30RP 103-04.

Kent Police Department (KPD) Detective Rob Scholl contacted Stan Muller around noon on March 9, 2007. 18RP 50-52. When Scholl informed Muller that Lorentson had been found murdered, Muller directed Scholl and his partner to the Seatac home of Connor's mother, which he knew Connor frequented regularly. 18RP 53-54.

In the very early morning of March 10, 2007, a group of KPD investigators arrived at the Seatac residence in an attempt to locate Connor, but he was not present. 19RP 63. However, Connor's sister, Mary Connor, and his uncle, Laurence Rex, were home. 19RP 63; 25RP 65.

Mary testified that she had spoken with Connor on the afternoon of March 7, and that he had sounded upset while explaining that he suspected Lorentson was going to end her romantic relationship with him. 19RP 55-56. She also testified that when Connor arrived at their mother's home late on the night of March 7, he told her to tell "anyone" who asked that he had been there since 9:00 p.m. 19RP 59.

The following morning Connor accompanied Mary on a visit to her dentist. 19RP 60. While at lunch after the appointment, Connor told Mary that she might not see him for a period of time. 19RP 60-61. Mary, believing that Connor was referring only to a parole violation, told him that he likely would only be incarcerated for a year. 19RP 60-61. Connor responded, "No, I did something else." 19RP 62.

Connor's uncle, Laurence Rex, testified that Connor arrived at the Seatac residence on the night of March 7 carrying a bag of

his clothing and wearing clothes that belonged to Connor's brother. 25RP 69. Connor asked Rex to start a fire; after Rex did so, Connor removed dark-stained clothing from the bag he was carrying and burned them, along with the bag, in the fireplace. 25RP 70-71. Connor then showered and laundered the clothes he'd arrived in. 25RP 71-72.

Soon after the police visit around midnight on March 9-10, 2007, Rex called Connor and told him that the police were looking for him. 25RP 74.

At the request of primary KPD Detective Steve Kelly, a local fugitive task force found Connor in Seattle on March 12, 2007, placed him under arrest, and transported him to meet with Kelly and his partner, Det. Tim Ford. 21RP 169-71, 203. Connor expressed no emotion when told of Lorentson's death, though he described her as "his girl." 21RP 173. He said that he'd last seen Lorentson in downtown Seattle on March 7 around 9:00-10:00 p.m., that they chatted for 30 to 40 minutes, and then went their separate ways. 21RP 174-75. Connor told the detectives that Lorentson had told him she was leaving for Oregon for a whitewater rafting trip and then on to California. 21RP 182.

Det. Ford testified that in his entire investigation of this incident, not a single other person ever told him that Lorentson had spoken of a plan to go rafting in Oregon. 21RP 183.

Megan Inslee, a forensic scientist in the state patrol crime laboratory's DNA unit, examined a number of items of evidence from the crime scene. 27RP 4-5, 51. Connor's DNA was found on vaginal swabs taken from Lorentson's body, as well as on the crotch area of the gray pants and black underwear that Lorentson was wearing when she was found on March 9. 27RP 56, 83, 100. Inslee also detected the DNA of a man named Reginald Smith on Lorentson's white sweatpants, which had been found in her bathroom. 27RP 91-92.

Reginald Smith testified that he had recently rekindled his friendship with Lorentson, whom he'd met a few years earlier while they were students at Seattle Central Community College. 21RP 47. Smith explained that he had spent the night with Lorentson at her Kent apartment on March 5 or 6, and that he performed oral sex on her during that encounter. 21RP 55-56.

He explained that Lorentson drove him to work the following morning, and had next visited him at his home, in Federal Way, on the afternoon of March 7. 21RP 55, 58. He and Lorentson

engaged in sexual intercourse that afternoon. 21RP 60-61. Smith withdrew before ejaculating, and deposited his semen either on Lorentson's leg or belly. 34RP 8.

Smith testified that he believed Lorentson departed from his residence around 9:00 p.m., but left her jacket behind. 21RP 63. Smith called Lorentson on her cell phone, and she told him that she would return later that night, after skating, to retrieve it. 21RP 63. She did not come back that night, and Smith never heard from or saw her again. 21RP 63.

While incarcerated and awaiting trial at the King County Jail, Connor befriended fellow inmate Ericson Gonzales. 29RP 51-53. Connor told Gonzales that he had stabbed his ex-girlfriend. 29RP 55. Connor said that he had feared his girlfriend might "snitch" on him to the FBI or local police, and that he had killed her after an argument about her having sex with another man. 29RP 56-57. Connor explained that he had seen the other man leaving Lorentson's apartment and tried without success to catch up to him. 29RP 57-58. He added that he became enraged and was already "high on drugs," and that he lost control and stabbed his girlfriend multiple times. 29RP 58. Connor said that he then fled to his mother's house, where he cleaned up. 29RP 59-60.

Store surveillance video from a K-Mart and a TJ Maxx store in Kent was presented to the jury, and showed Lorentson purchasing items at those locations at 12:47 p.m. and 9:36 p.m. on March 7, respectively. 18RP 46-48; 25RP 56-58.

Ronnie Bland, the father of Lorentson's daughter, Jade, testified that he picked Jade up from outside her Kent apartment in the mid-afternoon of March 7. 20RP 39-40. He tried reaching Lorentson by phone on Thursday, March 8, but was never able to reach her. 20RP 27. He learned of Lorentson's death when he drove with Jade to the apartment complex near noon on March 9, and saw a number of police cars in the parking lot. 20RP 24-26.

Connor did not testify in the defense case-in-chief.
33RP 134.

C. ARGUMENT

**THE EVIDENCE ESTABLISHED THAT CONNOR
PREMEDITATED HIS KILLING OF MERIANNE
LORENTSON.**

Connor's sole challenge on appeal is to the sufficiency of the evidence supporting the jury's conclusion that he acted with the requisite level of intent necessary to support his conviction for murder in the first degree. See Brief of Appellant, at 24. In other

words, he effectively concedes that the evidence proved that he killed Merianne Lorentson when he stabbed her over 30 times in her Kent apartment, and that he meant to end her life. However, he asserts that the State failed to prove he did so with premeditation.

Connor's claim is without merit. Through physical evidence obtained at the crime scene and through Connor's own words and behavior, the State presented abundant proof to allow the jury to reasonably conclude that he acted with something more deliberative than spontaneous rage.

Evidence is sufficient to support a conviction if, after viewing all of it in the light most favorable to the State, any rational trier of fact could have found any disputed elements proved beyond a reasonable doubt. State v. Finch, 137 Wn.2d 792, 831, 975 P.2d 967 (1999). When a defendant challenges the evidentiary sufficiency of the State's case, all reasonable inferences from the evidence must be drawn in favor of the State and interpreted most strongly against the defendant. State v. Gentry, 125 Wn.2d 570, 597, 888 P.2d 1105 (1995). Furthermore, a defendant who claims insufficiency admits the truth of the State's evidence and all inferences that can reasonably be drawn therefrom. Id.

The premeditated intent to cause another's death is an essential element of the crime of first-degree murder. See RCW 9A.32.030. Premeditation "must involve more than a moment in point of time." RCW 9A.32.020(1). The State must present evidence upon which the jury can reasonably conclude that the defendant formed and reflected on his intent to kill, for however short a period of time. State v. Hoffman, 116 Wn.2d 51, 82-83, 804 P.2d 577 (1991).

The general standard for reviewing a challenge to evidentiary sufficiency applies when determining whether evidence of premeditation is sufficient. Gentry, 125 Wn.2d at 597. Premeditation can be proven by circumstantial evidence. State v. Luoma, 88 Wn.2d 28, 33, 558 P.2d 756 (1977). Indeed, the essential element of intent is most often proved by such evidence, as premeditation and deliberation are mental processes that are not readily susceptible to proof by direct evidence. State v. Ginyard, 334 N.C. 155, 158, 431 S.E.2d 11 (1993).

The Supreme Court of Washington has long recognized the value of circumstantial evidence as proof of premeditation when that evidence has appeared in the forms of infliction of multiple wounds, the use of a weapon, stealth or surprise attack, and

evidence of a motive such as robbery or sexual assault. Gentry, 125 Wn.2d at 599, citing State v. Ollens, 107 Wn.2d 848, 853, 733 P.2d 984 (1987). Nationwide, courts have also noted other evidence as indicative of premeditation, such as the cruelty of the killing and the nature of the wounds inflicted, the conduct of the defendant before and shortly after the killing, a lack of immediate provocation on the victim's part, and whether serious injuries were inflicted after the victim was felled or otherwise offered no resistance. See, e.g., State v. Thacker, 164 S.W.3d 208, 222 (Tenn. 2005); State v. Navarro, 272 Kan. 573, 35 P.3d 802 (2001); Ginyard, 334 N.C. at 158-59.

The number and nature of the injuries wreaked upon a victim may be seen as "the windows of the mind through which" the jury can see the defendant's subjectivity when he committed his deadly act. State v. Lynch, 215 Neb. 528, 534, 340 N.W.2d 128 (1983); see also State v. Fisher, 318 N.C. 512, 518, 350 S.E.2d 334 (1986) (observing that the brutality in which a murder was performed can be indicative of premeditation). Infliction of a high number of deadly wounds – i.e., overkill – can reasonably be interpreted by a jury as a manifestation of a killer's pre-determined plan to ensure his victim's demise. See, e.g., State v. Woldegeorgis, 53 Wn. App. 92,

93-94, 765 P.2d 920 (1988) (finding probative value in multiplicity of wounds, in locations all over victim's body).

Here, the jury learned from the medical examiner that Lorentson was stabbed 36 times, and that the majority of those wounds were concentrated around her neck. 30RP 75-104. At least three of these neck wounds were extraordinarily severe; two severed Lorentson's carotid arteries and jugular veins, and the other was the result of Connor plunging a knife through Lorentson's neck so far as to puncture her lung. 30RP 77, 78-79, 85. Connor also stabbed Lorentson in her chest, twice penetrating her rib cage and again puncturing her lung, and he inflicted a four-inch-deep wound to Lorentson's back, damaging two lumbar vertebra and slashing her left renal vein. 30RP 99, 102, 104. It is abundantly clear that Lorentson was not merely stabbed to death. She was deliberately butchered.

Additionally, the presence of numerous injuries *other than* the wounds that caused the victim's death may reasonably be construed by a jury as evidence of premeditation, because they show "more action or thought than mere infliction of the fatal act." State v. Bingham, 105 Wn.2d 820, 826, 719 P.2d 109 (1986). Here, Connor inflicted a far greater number of stab wounds than

were necessary to end his girlfriend's life. He tortured her, as more than two dozen superficial and/or non-lethal cuts bear witness.

30RP 75, 77, 83-85, 88-92, 95-96.

Connor may not have been driven to murder Lorentson to effectuate a robbery or another crime, but he explained his motivation both to fellow inmate Erickson Gonzales and to his brother's girlfriend, Sarah Pitera. He told Gonzales that he'd become enraged and stabbed Lorentson immediately following his discovery that Lorentson had been engaged in sexual contact with another, African-American man, whom he'd seen leaving Lorentson's apartment as he arrived at her building. 29RP 57-58. Though he did not confess his crime to Pitera, he told her, on the day following the murder, that he knew Lorentson had been "cheating on him" with a light-skinned man. 24RP 22. Chillingly, he added that he "felt like stabbing" Lorentson. 24RP 22. Evidence of ill-will "tends to show the relationship of the parties and their feelings one toward the other, and often bears directly upon the state of mind of the accused with consequent bearing upon the question of malice and premeditation." State v. Davis, 6 Wn.2d 696, 705, 108 P.2d 641 (1940).

Connor took care, undoubtedly, to diminish the egregiousness of his conduct, depicting Lorentson's stabbing to Gonzales as the product of his sudden, uncontrollable rage. 29RP 58. However, his attempt at minimization is belied by the plentiful forensic evidence found at Lorentson's apartment, of course, which showed (a) that he struck Lorentson with blunt force several times, along with electing to unfold and use a knife; (b) that Lorentson initially suffered a less-than-lethal assault, after which she removed the clothes she was wearing, and engaged in sexual activity with Connor; and (c) that he murdered her only after she dressed in different clothes and put on new shoes. 17RP 57-59, 65, 83-85; 27RP 56, 83, 100; 30RP 71-73, 97-98. Moreover, as Reginald Smith – most likely the African-American man whom Connor described seeing leave Lorentson's apartment -- explained, he had left the apartment on the morning of either March 5 or 6, many hours or days before Connor slew her, during which time, as the jury learned, she had engaged in a number of activities outside the home. 21RP 55; 18RP 46-48; 25RP 56-58. The physical and testimonial evidence shows a sequence of events that is the very opposite of instantaneous, unreflecting rage.

In addition, Lorentson's body bore no defensive wounds or other signs that she struggled against Connor's lengthy attack. Absence of signs of a struggle can be indicative of premeditation, as it reduces the likelihood that the assault suddenly occurred in the context of a heated argument. State v. Sargent, 40 Wn. App. 340, 353, 698 P.2d 598 (1985); see also People v. Jones, 115 Mich. App. 543, 553, 321 N.W.2d 723 (1982) (finding proof of premeditation in the absence of "any circumstances such as a struggle, an attack by the victim or any other occurrence that would prompt an unthinking use" of a weapon).

Finally, a jury is entitled to conclude that a defendant's calm, collected behavior shortly after his murderous act demonstrates that he committed the crime after deliberation, rather than as a result of an impulsive, consuming frenzy. See Fisher, 318 N.C. at 517. Here, after completing his horrific crime, Connor arranged to be driven to his mother's home, likely by his brother, whose clothes he was wearing when he arrived. 25RP 69. He calmly directed his uncle to build a fire, and then threw a bag of his own clothing, which bore dark stains, into the fireplace to incinerate them. 25RP 71. He told his sister and his mother that, if asked by anyone how long he'd been at the house, they should answer that

he'd been there since 9:00 p.m. 19RP 59. Connor's post-murderous conduct can hardly be characterized as the behavior of someone regaining his senses after unplanned and unthinking fury.

In sum, the jury was presented with substantial evidence to allow it to reasonably decide that Connor beat, cut, and then brutally stabbed his girlfriend to death over a significant period of time inside her apartment on the night of March 7, 2007. The jury could rationally conclude that Connor committed murder not in a sudden spasm of jealous rage, but coolly, after inflicting several blood-letting injuries and after having intercourse with his victim, who likely acquiesced to his sexual advances in a desperate attempt to avoid further injury. Connor did not merely kill Lorentson after momentary premeditation; he deliberately tortured her, physically and psychologically, before completing his plan by repeatedly plunging his knife deep into her neck and torso, ending the young mother's life.

D. CONCLUSION

The jury was provided with sufficient evidence to support its conclusion that Connor acted with premeditated intent when he

brutally murdered Merianne Lorentson. His conviction should be affirmed.

DATED this 7th day of August, 2012.

Respectfully submitted,

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APPENDIX A

The Verbatim Report of Proceedings consists of 37 volumes, identified in this brief as follows:

RP#	HEARING DATE(S)
1RP	10/2/2009
2RP	1/5/2010
3RP	1/29/2010
4RP	3/26/2010
5RP	5/7/2010
6RP	6/30/2010
7RP	8/20/2010
8RP	9/10/2010
9RP	10/15/2010
10RP	1/10/2011; 1/11/2011; 1/12/2011; 1/18/2011; 1/28/2011; 2/7/2011
11RP	2/23/2011
12RP	2/28/2011
13RP	3/1/2011
14RP	3/2/2011
15RP	3/7/2011
16RP	3/8/2011
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20RP	3/15/2011
21RP	3/16/2011; 3/17/2011
22RP	3/21/2011
23RP	3/22/2011
24RP	3/23/2011
25RP	3/24/2011
26RP	3/28/2011
27RP	3/29/2011
28RP	3/30/2011
29RP	3/31/2011
30RP	4/4/2011
31RP	4/5/2011
32RP	4/6/2011
33RP	4/11/2011
34RP	4/12/2011
35RP	4/13/2011
36RP	4/14/2011
37RP	5/11/2011

Certificate of Service by Mail

Today I deposited in the mail of the United States of America, postage prepaid, a properly stamped and addressed envelope directed to Christopher Gibson, the attorney for the appellant, at Nielsen Broman & Koch, P.L.L.C., 1908 E. Madison Street, Seattle, WA 98122, containing a copy of the Brief of Respondent, in STATE V. RANDALL CONNOR, Cause No. 67142-1-I, in the Court of Appeals, Division I, for the State of Washington.

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

W Brame
Name
Done in Seattle, Washington

8/8/12
Date