

FILED  
SUPREME COURT  
STATE OF WASHINGTON  
11/7/2022 11:10 AM  
BY ERIN L. LENNON  
CLERK

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

STATE OF WASHINGTON,

Respondent,

vs.

ALEJANDRO S. MARTINEZ,

Appellant,

NO. 101279-9

MOTION TO ALLOW  
SUPPLEMENTING THE  
RECORD BY PROVIDING FOR  
DESIGNATION OF AN EXHIBIT  
LIST

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**I. IDENTITY OF THE MOVING PARTY**

COMES NOW the State of Washington, Respondent, by and through Andy Miller, Prosecuting Attorney, and Terry Bloor, Deputy Prosecuting Attorney in the above-captioned cause and ask for the relief designated in Part II.

**II. STATEMENT OF RELIEF SOUGHT**

The State of Washington requests the Court allow for Supplementing the Record by additional designation of the exhibit list in the trial.

### **III. FACTS RELEVANT TO MOTION**

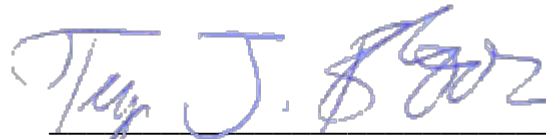
The State alleged in the trial that the defendant's use of the name "Alex Ocampo" or "Alex Ocampo Martinez" was part of his effort to hide his identity. The defendant claimed that under Hispanic naming customs his correct name is Alex Ocampo Martinez or Alex Ocampo. For the first time in the Petition for Review, the defendant claimed that his birth certificate shows this name. See page 2, 21, and 33 of the Petition for Review. However, no birth certificate was admitted in the trial. The State therefore seeks to supplement the record by designating the exhibit list as a Clerk's Paper.

### **IV. GROUND FOR RELIEF**

The grounds for relief are RAP 9.10 and the facts in Part III of this motion. This document contains 193 words, excluding the parts of the document exempted from the word count by RAP 18.17.

**RESPECTFULLY SUBMITTED** this November 7, 2022

**ANDY MILLER**  
Prosecuting Attorney



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**TERRY J. BLOOR**, WSBA #9044  
*Chief Deputy, Criminal Prosecuting  
Attorney*  
OFC ID 91004

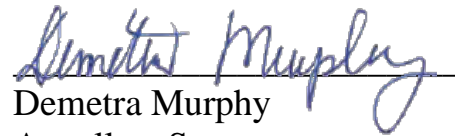
## CERTIFICATE OF SERVICE

I certify under penalty of perjury under the laws of the State of Washington that on this day I served, in the manner indicated below, a true and correct copy of the foregoing document as follows:

Mary Swift  
Nielsen Koch & Grannis, PLLC  
2200 Sixth Ave., Ste. 1250  
Seattle, WA 98121

E-mail service by  
agreement was made to  
the following parties:  
[swiftm@nwattorney.net](mailto:swiftm@nwattorney.net)

Signed at Kennewick, Washington on November 7, 2022.

  
Demetra Murphy  
Appellate Secretary

**BENTON COUNTY PROSECUTOR'S OFFICE**

**November 07, 2022 - 11:10 AM**

**Transmittal Information**

**Filed with Court:** Supreme Court  
**Appellate Court Case Number:** 101,279-9  
**Appellate Court Case Title:** State of Washington v. Alejandro S. Martinez  
**Superior Court Case Number:** 98-1-00742-1

**The following documents have been uploaded:**

- 1012799\_Motion\_20221107110850SC133555\_1890.pdf  
This File Contains:  
Motion 1 - Other  
*The Original File Name was 1012799 Martinez - Motion-to-supplement.pdf*

**A copy of the uploaded files will be sent to:**

- Sloanej@nwattorney.net
- andy.miller@co.benton.wa.us
- swiftm@nwattorney.net

**Comments:**

Motion to Supplement the Record

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Sender Name: Demetra Murphy - Email: deme.murphy@co.benton.wa.us

**Filing on Behalf of:** Terry Jay Bloor - Email: terry.bloor@co.benton.wa.us (Alternate Email: prosecuting@co.benton.wa.us)

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**Note: The Filing Id is 20221107110850SC133555**