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SUPREME COURT
STATE OF WASHINGTON
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Supreme Ct. No. 90735-8
COA No. 30222-9-III

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,
Respondent,

vs.

JOSE LEONEL MONCADA,
Petitioner.

ANSWER TO PETITION FOR REVIEW

JAMES P. HAGARTY
Prosecuting Attorney

TAMARA A. HANLON
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ORIGINAL

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A. IDENTITY OF RESPONDENT

The Respondent is the State of Washington.

B. COURT OF APPEALS DECISION

The Petitioner seeks review of the Court of Appeals [Division III] decision in an unpublished opinion filed on July 31, 2014.

C. ISSUES PRESENTED FOR REVIEW

1. Should the petition for review be denied when it was not filed within the 30 days mandated by court rule?

2. Should the petition for review be denied when it does not meet any of the criteria for acceptance under RAP 13.4(b)?

D. STATEMENT OF THE CASE

On April 13, 2010, Moncada was charged with rape of a child in the first degree. (CP 3). On April 23, 2010, he was arraigned on the information. (CP 4). Omnibus was set on May 20, 2010. (CP 4). An agreed order of continuance was entered on May 20, 2010. (CP 5). Another agreed order of continuance was entered on July 15, 2010. (CP 7). On October 14, 2010, Moncada executed a waiver of his speedy trial rights and agreed to a new commencement date of November 5, 2010. (CP 9). This waiver resulted in a trial expiration date of January 4, 2011.

On December 17, 2010, defense counsel requested a continuance which was not joined in by Moncada. Counsel expressed a need for more

time to go over interviews and prepare for trial. The court found that the continuance was in the interest of justice. (CP 12; 12-17-10 RP 12-13). Trial was set for January 17, 2010.

Two counts of attempted first degree child molestation were added on February 7, 2011. (CP 21-23).

On February 15, 2011, the parties entered an agreed continuance order. (See attached Appendix A). The order sets trial on February 22, 2011. On February 18, a trial status order was entered, and indicated that speedy trial expired on March 24, 2011. (CP 25). (See attached Appendix B). There was no objection to the order.

On February 28, 2011, a contested order of continuance was entered because the assigned prosecutor was in another trial at the time. (CP 26). Trial was set for March 7, 2011.

On April 4, 2011, the State sought a contested continuance due to illness of the assigned prosecutor. The continuance was granted and trial was set for April 11, 2011.

Trial began on April 19, 2011. On the first day of trial, Moncada argued that speedy trial had been violated. Defense counsel pointed to the agreed continuance granted on February 15, 2011. (4-19-11 RP 7-9). He argued that the expiration of speedy trial would have remained February 22, 2011 even after the February 15th continuance.

The State agreed that the February 15th continuance was under CrR 3.3(f), but pointed out that the continuance on that date was at the request of the defense, and that further, any continuance granted under section (f) had the consequence of excluding time from the speedy trial period under section (e), then triggering the 30-day buffer period pursuant to CrR 3.3(b). The State reiterated its position, as stated on February 15, 2011, that the February 15th order resulted in a speedy trial expiration date of March 24, 2011. (4-19-11 RP 10-11).

The deputy prosecutor further relayed that she had discussed entry of the February 18, 2011 amended trial status order with defense counsel before handing it up to the court. And defense counsel had agreed with the order because he wanted to start Moncada's trial on February 28th due to another trial he had. The expiration date on that trial status order was listed as March 24, 2011. There was, further, no objection lodged to the amended trial status order. (CP 25; 4-19-11 RP 11-15).

The trial court denied Moncada's motion to dismiss, finding that the continuance at issue on February 15th was an agreement to continue, and that since CrR 3.3(e) references CrR 3.3(f), the 30-day buffer was triggered. (4-19-11 RP 16).

A jury trial commenced and the jury found Moncada guilty of first degree rape of a child and one count of attempted first degree child

molestation. (CP 96). As to both counts, the jury found by special verdict the aggravating circumstances of use of a position of trust to facilitate his commission of the crimes. (CP 55, 59).

Moncada appealed his convictions. The State conceded error and on September 13, 2012, moved to remand for correction of certain portions of the judgment and sentence. On that same date, Moncada filed a statement of additional grounds, asserting that his appellant counsel was ineffective by failing to assign error to the speedy trial issue. He also claimed prosecutorial misconduct. Moncada's appellate counsel filed a reply to the State's concession, asking the court to deny the motion to remand until it had ruled on the issues raised by Moncada.

The Court of Appeals found that there was no violation of CrR 3.3. Thus, there was no ineffective assistance of counsel and no prosecutorial misconduct. An unpublished opinion was filed on June 17, 2014. Moncada moved for reconsideration and his motion was denied on July 31, 2014. His petition for review was filed on September 3, 2014 in the Court of Appeals.

E. ARGUMENT WHY REVIEW SHOULD BE DENIED

1. The Rules of Appellate Procedure strictly mandate that a petition for review must be received by the Court within 30 days of the decision appealed.

After the Court of Appeals issues a decision terminating review, a party has 30 days in which to file a motion for discretionary review or petition for review. RAP 13.4(a). Although many rules of appellate procedure are to be interpreted liberally, with the court's focus on the exercise of justice rather than strict adherence to the rules, the deadline for filing a petition for review or motion for discretionary review are not among those rules that may be liberally applied. RAP 1.2(a), (c); RAP 18.8(b). RAP 18.8(b) provides:

> The appellate court will only in extraordinary circumstances and to prevent a gross miscarriage of justice extend the time within which a party must file a ... a petition for review.... The appellate court will ordinarily hold that the desirability of finality of decisions outweighs the privilege of a litigant to obtain an extension of time under this section. The motion to extend time is determined by the appellate court to which the untimely notice, motion or petition is directed.

RAP 13.5(a) states that a petition for review must be filed in the Supreme Court and a copy served in the Court of Appeals **within 30 days** after the date of the decision. Petitions for review are timely filed only if actually received by the appropriate appellate court within the

time for filing; they are not timely filed if simply mailed within the time for filing. RAP 18.6(c). RAP 18.6(c) states that unlike some other pleadings such as appellate briefs, a petition for review "is timely filed only if it is received by the appellate court within the time for filing."

Here, the Court of Appeals issued its unpublished decision on June 17, 2014. A motion for reconsideration was denied on July 31, 2014. Monday, September 1 was the due date for the Appellant's petition for review.

Moncada filed his petition for review incorrectly in the Court of Appeals on September 3, 2014. ACORDS computer system indicates it received a copy on September 3, 2007. ACORDS (copy of computer entry attached as Appendix C).

Moncada has not explained that any extraordinary circumstances prevented him from filing the petition by the mandatory deadline. He has not presented any explanation for his failure to comply with the Rules of Appellate Procedure and file his petition for review within the mandatory timeframe. As RAP 18.8(b) dictates, when a party seeks to appeal a final Court of Appeals decision, the mandatory deadlines will not be extended unless there are extraordinary circumstances. No extraordinary circumstances are present here. Moncada's petition for review should be denied as untimely filed.

2. The petition does not meet the criteria of RAP 13.4(b).

In re Coats explained the standard for when review should be accepted by this court:

> Thus, the petitioner must persuade us that either the decision below conflicts with a decision of this court or another division of the Court of Appeals, that it presents a significant question of constitutional interest, or that it presents an issue of substantial public interest that should be decided by this court. RAP 13.5A(a)(1), (b); RAP 13.4(b).

In re Pers. Restraint of Coats, 173 Wn.2d 123, 132-133, 267 P.3d 324 (2011).

The Court of Appeal decision does not involve a significant question of constitutional law. Moncada has not indicated in his petition how this case involves any significant question of constitutional law. The Court of Appeal decision also does not involve an issue of substantial public interest. In addition, Moncada has not argued how this case involves any issue of substantial public interest. Finally, the decision does not conflict with a decision of the Supreme Court or a decision of the Court of Appeals.

a. There was no violation of Moncada's speedy trial rights.

Alleged violations of the speedy trial rule are reviewed *de novo*. *State v. Carlyle*, 84 Wn. App. 33, 35-36, 925 P.2d 635 (1996), *cited in* *State v. Kenyon*, 167 Wn.2d 130, 135, 216 P.3d 1024 (2009).

The time-for-trial provisions were fundamentally overhauled in 2003. The task force charged with drafting the new rules stated this:

> Task force members are concerned that appellate court interpretation of the time-for-trial rules has at times expanded the rules by reading in new provisions. The task force believes that the rule, with the proposed revisions, covers the necessary range of time-for-trial issues, so that additional provisions do not need to be read in. Criminal cases should be dismissed under the time-for-trial rules only if one of the rules' express provisions have been violated; other time-for-trial issues should be analyzed under the speedy trial provisions of the state and federal constitutions.
> . . .
>
> *Proposed Subsection (b)(5) (Allowable Time After Excluded Period) (new provision).* This subsection proposes a significant change from the current rule – a 30-day buffer period to follow any excluded period of time. The current rule does not provide adequate time for preparing and trying cases in which an excluded period of time runs out shortly before the expiration of a defendant's 60/90 time period.

WASH. COURTS TIME-FOR-TRIAL TASK FORCE, FINAL

REPORT II.B at 12-13 (October 2002).

Indeed, the Supreme Court has since observed that "the purpose of the 2003 reform was to clarify and simplify the time-for-trial rule, making it easier to apply, and thus avoiding the unpredictability that resulted from the due diligence standards imposed under the former rule." *State v. George*, 160 Wn.2d 727,738, 158 P.2d 1169 (2007).

Under *former* CrR 3.3(d)(8), there existed a provision for administrative, five-day trial date extensions. Under that provision: "[w]hen a trial is not begun on the date set because of unavoidable or unforeseen circumstances beyond the control of the court or the parties, the court, even if the time for trial has expired, may extend the time within which trial must be held for no more than 5 days . . . unless the defendant will be substantially prejudiced in his or her defense."

As part of the overhaul of CrR 3.3, the administrative continuance went by the wayside. As the State argued below, it was by operation of the rule itself that the 30-day buffer was triggered. The February 15th continuance fell under CrR 3.3(f)(2), the period until February 22, 2011 was therefore excluded under CrR 3.3(e)(3), and pursuant to CrR 3.3(b)(5), expiration of speedy trial could be no sooner than 30 days later, or March 24, 2011. The court could not, in fact, order otherwise, and the

court on February 15th was mistaken in believing that a one-week administrative continuance would not alter the expiration date calculation.

The latter denial of the motion to dismiss on April 19, 2011 was not error. The continuances were required in the administration of justice, Moncada was not prejudiced in the presentation of his defense, and there was lapse in his rule-based speedy trial periods.

There was likewise no violation of Moncada's constitutional speedy trial rights. A claim of denial of constitutional speedy trial rights is also reviewed *de novo*. The method of analysis for determining whether a defendant's constitutional right to a speedy trial has been violated is the same for both the Sixth Amendment and Art. I., § 22. *State v. Iniquez*, 167 Wn.2d 273, 280, 290, 217 P.3d 768 (2009).

The Sixth Amendment analysis is in four parts: first, a defendant must demonstrate that a trial delay is presumptively prejudicial, then a reviewing court must engage the balance of the four-part inquiry set forth in *Barker v. Wingo*, 407 U.S. 514, 530, 92 S. Ct. 2182, 33 L. Ed. 2d 101 (1972), which was cited by *Iniquez*, 167 Wn.2d at 283.

After a showing of presumptive prejudice, the court next addresses the reason for the delay, the extent to which the defendant asserts his speedy trial right, and finally the prejudice to the defendant as a result of the delay. *Id.*

While it is true that the constitutional speedy trial right cannot be precisely quantified, a delay of more than 8 months has been held to be presumptively prejudicial after a fact-specific analysis. *Iniguez*, 167 Wn.2d at 293. However, it should be noted that the Supreme Court ultimately found that there was no violation of speedy trial in Iniguez, and very much unlike the facts in this case, the defendant there had objected to several continuances granted by the court. *Id.* at 277, 295-96.

Here, Moncada agreed to a commencement date of November 5, 2010, with a speedy trial expiration of January 4, 2011. He then refused to sign the December 17 continuance order, but the fact that counsel was preparing for trial, and needed more time to do so, is amply demonstrated in the record. Moncada agreed to move his trial to February 22, but indicated he was not in agreement with any further continuances.

Under the circumstances of the case, it is not surprising that defense counsel would need significant time to prepare for serious charges of first degree rape of a child and multiple counts of attempted first degree child molestation. The State would submit that Moncada has not shown that the length of any delay was presumptively prejudicial.

Even if presumptively prejudicial, the reasons for delay were sound. Both counsel had trial conflicts during the pendency of the case, and as indicated above, defense counsel was faced with voluminous

discovery to review and witness interviews to conduct. It is apparent he was thoroughly preparing for trial. Moncada, for the same reasons identified above, has not demonstrated that he was prejudiced by the delay.

b. Moncada did not meet his burden of showing that his appellate counsel was ineffective.

To prevail on a claim of ineffective assistance of counsel, a defendant must show that (1) defense counsel's representation was deficient, *i.e.*, it fell below an objective standard of reasonableness based on consideration of all the circumstances; and (2) defense counsel's deficient representation prejudiced the defendant, *i.e.*, there is a reasonable probability that, except for counsel's unprofessional errors, the result of the proceeding would have been different. *State v McFarland*, 127 Wn.2d 322, 334-35, 899 P.2d 1251 (1995), *citing State v. Thomas*, 109 Wn.2d 222, 225-26, 743 P.2d 816 (1987); *Strickland v. Washington*, 466 U.S. 668, 687, 104 S. Ct. 2052, 80 L. Ed. 2d 674 (1984).

In weighing the two prongs found in *Strickland*, a reviewing court begins with a strong presumption that defense counsel's representation was effective. In fact, the presumption "will only be overcome by a clear showing of incompetence." *State v. Varga*, 151 Wn.2d 179, 199, 86 P.3d 139 (2004). A claim of ineffective assistance of counsel presents a mixed

question of law and fact, reviewed *de novo*. *In re Personal Restraint of Fleming*, 142 Wn.2d 853, 865, 16 P.3d 610 (2001).

Because the presumption runs in favor of effective representation, a defendant must show in the record the absence of legitimate strategic or tactical reasons supporting the challenged conduct by counsel. *State v. Garrett*, 124 Wn.2d 504, 520, 881 P.2d 185 (1994).

Failure to raise all possible nonfrivolous issues on appeal by appellate counsel is not ineffective assistance. *In re Personal Restraint of Lord*, 123 Wn.2d 296, 314, 868 P.2d 835 (1994). "Rather, the exercise of independent judgment in deciding which issues may be the basis of a successful appeal is at the heart of the attorney's role in our legal process." *Smith v. Murray*, 477 U.S. 527, 536, 91 L. Ed. 2d 434, 106 S. Ct. 2661 (1986); *cited in Lord*, 123 Wn.2d at 314. Counsel may not ethically bring a claim upon a frivolous basis. RPC 3.1

Also, as Moncada acknowledges, in order to prevail on a claim of appellate ineffectiveness, he must show the merit of the underlying legal issues his appellate counsel failed to raise or raised improperly, and then demonstrate actual prejudice. *Id.* (citing *Kimmelman v. Morrison*, 477 U.S. 365, 375, 91 L. Ed. 2d 305, 106 S. Ct. 2574 (1986)).

Moncada has not demonstrated that his appellate counsel failed to raise a meritorious claim. Experienced and competent appellate counsel

would recognize that the speedy trial issue had no merit as demonstrated above; the application of the court rule and case law is clear. Even if the issue was not frivolous, there is no showing of actual prejudice, as the denial of the motion to dismiss ultimately was well-founded.

c. There was no prosecutorial misconduct.

There is no merit to Moncada's claim that the prosecutor committed misconduct by handing up the amended trial status order on February 18, 2011. Moncada argues that "the Prosecutor circumvented the Rule by going to a different Judge than the assigned Judge, to get the continuance the assigned Judge would have denied." (Petition for Review at 5). First of all, Moncada misspeaks when he labels the February 18 order a continuance. It was a trial status order. No dates were continued. Second, as demonstrated in the record of the motion to dismiss, and the exhibits admitted at that time, the trial status order was not presented to the court until the prosecutor had consulted with defense counsel and they agreed with the order being presented to Judge Reukauf. (See Ex. B,C). There was nothing improper or unethical about entry of the order. It was completely agreed. (Ex. B,C).

Furthermore, no particular judge was pre-assigned to the case on February 18, 2011. Judge Reukauf had signed previous orders on the case and just happened to be the judge presiding over the February 18 criminal

"triage" docket. Prior to the February 18 hearing, Judge Reukauf had signed multiple orders in Moncada's case. Below is a list of the various judges that were presiding over some of Moncada's court hearings up until trial. Judge Elofson presided over the trial.

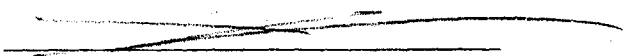
October 26	Judge Schwab
December 3	Judge Reukauf
December 10	Judge Reukauf
December 17	Judge McCarthy
February 7	Judge Reukauf
February 15	Judge McCarthy
February 18	Judge Reukauf
April 4	Judge Gibson
April 19	Trial begins in front of Judge Elofson

As such, Moncada's claim of prosecutorial misconduct was entirely without merit and the Court of Appeals correctly held that there was no misconduct on behalf of the State.

F. CONCLUSION

The Court should deny the Petitioner's Petition for Review for the reasons outlined above.

Respectfully submitted this 3rd day of October, 2014,



TAMARA A. HANLON WSBA 28345
Senior Deputy Prosecuting Attorney

APPENDIX A

FILED

2011 FEB 15 PM 12:34

SUPERIOR COURT OF WASHINGTON FOR YAKIMA COUNTY

EX OFFICIO CLERK
SUPERIOR COURT
YAKIMA, WASHINGTON

STATE OF WASHINGTON,

Plaintiff,

vs.

Jose Monroy

Defendant.

DOB:

☐ Interpreter ☒ In Custody ☐ Out of Custody

NO. 10-1-00543-4

ORDER OF CONTINUANCE (AGREED)

(ORCNT)

AGREEMENT TO CONTINUE

The prosecutor and the defendant hereby agree to continue the trial date in this case to the date set forth below in the Scheduling Order section. The period between the date of this order and the trial date shall be an excluded period in computing the allowable time for trial. (CrR 3.3(e)(3).) THIS AGREEMENT MUST BE PERSONALLY SIGNED BY THE DEFENDANT.

DATED: 02.15.11

REFUSED

DEFENDANT

Agreed on Record

SCHEDULING ORDER

The defendant and the attorneys shall appear in court on each date and time shown. Defendant's failure to appear may result in new criminal charges, an arrest warrant, forfeiture of bail, and rescheduling of the trial date.

The court orders that the hearing and/or trial date(s) is/are continued to the date(s) indicated below.

☐ **OMNIBUS HEARING:** ☐ 8:30 AM ☐ 1:00 PM ☐ Wednesday ☐ Thursday _____

☒ **TRIAL:** 9:00 AM Monday [redacted] 02.22.11

☒ **TRIAGE HEARING:** 9:00 AM 02.18.11 Date: _____

☐ **PLEA HEARING:** 9:00 AM _____ Date: _____

☐ **HEARING:** _____ ☐ 9:00 AM ☐ 1:30 PM _____

DATED 02.15.11

JUDGE

Attorney for Defendant, WSBA # 19866

Prosecuting Attorney, WSBA # 28345

REFUSED

Copy Received by Defendant

ORDER OF CONTINUANCE (AGREED)
Original – Clerk Blue – Defendant Green – Jail Canary – Defense Atty. Pink – Pros. Atty. Goldenrod – Ct. Admin.
July 2010

ST= 2-22-11

APPENDIX B

FILED

2011 FEB 18 AM 11:29

EX OFFICIO CLERK
SUPERIOR COURT
YAKIMA WASHINGTON

SUPERIOR COURT OF WASHINGTON FOR YAKIMA COUNTY

STATE OF WASHINGTON,

Plaintiff,

vs.

Jose Moncada

DOB: 4/19/70 Defendant.

NO. 10-1-00543-4

TRIAL STATUS ORDER – Amended

(ORPTC)

TRIAL INFORMATION

THIS MATTER having come on before the undersigned judge of the above-entitled court, it is hereby intended that the following applies to the trial in this case:

Length of trial? 5 Days

Defendant in custody? X Yes ____ No

Interpreter needed? X Yes ~~X~~ No

Jury to be present at 1:30 AM/PM

Juror questionnaire: Yes

Any pretrial issues before voir dire: Yes - 3.5/motions in limine

Offer of settlement is available until N/A

Speedy trial time expires 3/24/11

This case should trail the following cases: Jorge Valencia, John Wilkins.

Scheduling issues for witnesses: DPA out 3/24 thru 4/1/2011

Defense starts around 3/7/11 in Douglas County expected to last 3 weeks.

SET FOR PLEA HEARING

The parties have agreed to set this case for a plea hearing on _____

DATED 2-18-11.

Judith E Ramseyer
JUDGE

WA State Bar Number 28345
Attorney for the State of Washington

WA State Bar Number
Attorney for Defendant

White: Clerk Green: Court Administrator Canary: Defendant Pink: Def. Attorney Goldenrod: Pros.
Revised March 2010

APPENDIX C

Case # 907358	Court : SUPREME COURT	Status : Pending
State of Washington v. Jose Leonel Moncada		

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Supreme Court Case
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Attorneys
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CASE EVENTS # 302229

Date	Item	Action	Participant
03/31/2015	Check case Information ***Comment:*** *Decision on Petition for Review?*	Due	
09/12/2014	Letter ***Comment:*** *#90735-8*	Received by Court	SUPREME COURT
09/03/2014	Petition for Review	Filed	Moncada, Jose Leonel
09/03/2014	Stayed ***Comment:*** *Supreme Court pending, sent to SC 9/5* *One pouch, Petition for Review, Briefs, CP(ELF and confidential), VRP(in sleeve), Exhibits sent.*	Status Changed	
07/31/2014	Order on Motion for Reconsideration ***Comment:*** *Order Denying Motion for Reconsideration and Denying Motion for Clarification*	Filed	SIDDOWAY, LAUREL H.
07/31/2014	Letter	Sent by Court	
07/31/2014	Order on Motions ***Comment:*** *Order Denying Motion for Reconsideration and Denying Motion for Clarification*	Filed	SIDDOWAY, LAUREL H.
07/31/2014	Letter	Sent by Court	
07/25/2014	Answer to motion **Service Date:** 2014-07-23 ***Comment:*** *Appellant's Objection and Motion to Dismiss Respondent's Motion for Clarification of Court's Ruling circulated to Panel 4 on 7/25/14.*	Filed	Moncada, Jose Leonel
07/18/2014	Affidavit of Service **Service Date:** 2014-07-16 ***Comment:*** *Sworn Statement of Service by Mail of the Motion for Clarification of Court's Ruling upon Jose Leonel Mendez Moncada*	Filed	HANLON, TAMARA ANN
07/16/2014	Letter **Service Date:** 2014-07-16 ***Comment:*** *from Mr. Moncada's former counsel Susan Gash advising the service on the motion for clarification was served upon her, instead of Mr. Moncada.*	Filed	
07/16/2014	Motion - Other **Service Date:** 2014-07-16 **Hearing Location:** None **Motion Status:** Decision filed ***Comment:*** *Motion for Clarification of Court's Ruling. Circulated to Panel 4 on 7/18/14*	Filed	HANLON, TAMARA ANN
07/09/2014	Motion for Reconsideration **Service Date:** 2014-07-03 **Hearing Location:** None **Motion Status:** Decision filed ***Comment:*** *Motion for Reconsideration circulated to Panel 4 on 7/9/14* *Mailbox rule applies as appellant is*	Filed	Moncada, Jose Leonel

DECLARATION OF SERVICE

I, Tamara A. Hanlon, state that on October 3, 2014, I put in the US mail a copy of Respondent's ANSWER TO PETITION FOR REVIEW to:

Jose L. Moncada, #349000
Coyote Ridge Correction Center
PO Box 769
Connell, WA 99326

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

DATED this 3rd day of October, 2014, at Yakima, Washington.

TAMARA A. HANLON
WSBA#28345
Senior Deputy Prosecuting Attorney
Yakima County, Washington
128 N. Second Street, Room 329
Yakima, WA 98901
Telephone: (509) 574-1210
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OFFICE RECEPTIONIST, CLERK

To: Tamara Hanlon
Subject: RE: STATE OF WASHINGTON V. JOSE L. MONCADA 907358

Received 10-3-14

Supreme Court Clerk's Office

Please note that any pleading filed as an attachment to e-mail will be treated as the original. Therefore, if a filing is by e-mail attachment, it is not necessary to mail to the court the original of the document.

From: Tamara Hanlon [mailto:Tamara.Hanlon@co.yakima.wa.us]
Sent: Friday, October 03, 2014 3:49 PM
To: OFFICE RECEPTIONIST, CLERK
Subject: STATE OF WASHINGTON V. JOSE L. MONCADA 907358

Attached for filing is State's Answer to Petition for Review

- case name: STATE OF WASHINGTON V. JOSE L. MONCADA
- case number: 90735-8

Tamara A. Hanlon, WSBA 28345
Senior Deputy Prosecuting Attorney
Appellate Unit
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