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SUPREME COURT
STATE OF WASHINGTON
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NO. 90994-6

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# IN THE COURT SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON, Respondent

v.

ANGELA MARIE RODRIGUEZ, Petitioner

FROM THE COURT OF APPEALS, DIVISION II NO. 44417-8-II CLARK COUNTY SUPERIOR COURT CAUSE NO.12-1-02039-6

#### RESPONSE TO PETITION FOR REVIEW

Attorneys for Respondent:

ANTHONY F. GOLIK Prosecuting Attorney Clark County, Washington

ANNE M. CRUSER, WSBA #27944 Deputy Prosecuting Attorney

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#### A. <u>IDENTITY OF RESPONDENT</u>

The State of Washington is the Respondent in this matter.

#### B. ISSUE PRESENTED FOR REVIEW

The State agrees with and adopts the issue statement presented by Petitioner Rodriguez.

### C. REASON REVIEW SHOULD BE GRANTED

The State concurs with the arguments set forth in the petition for review about why review is warranted. The State joins Rodriguez's request that this Court grant review, and maintains its concession of error on this issue.<sup>1</sup>

<sup>&</sup>lt;sup>1</sup> The State is willing to cede its oral argument time to a representative from WAPA, should WAPA ask to be heard in this matter. The State is not trying to foreclose a different viewpoint and does not pretend to speak for each prosecutor in the State. However, undersigned counsel believes that her position at the Court of Appeals was the correct position.

## D. <u>CONCLUSION</u>

The State, by this answer, joins Petitioner's request that review be granted in this case.

DATED this 26th day of November, 2014.

Respectfully submitted:

ANTHONY F. GOLIK Prosecuting Attorney Clark County, Washington

By:

ANNE M. CRUSER, WSBA #27944

Deputy Prosecuting Attorney