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SUPREME COURT OF THE STATE OF WASHINGTON

In re the Detention of:

ROY DONALD STOUT, JR.,

Petitioner,

v.

STATE OF WASHINGTON,

Respondent.

STATE OF WASHINGTON'S ANSWER TO PETITION FOR REVIEW

ROBERT W. FERGUSON
Attorney General

KRISTIE BARHAM
Assistant Attorney General
WSBA # 32764 / OID # 91094
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 389-2004

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I. IDENTITY OF RESPONDENT

The Respondent is the State of Washington.

II. DECISION BELOW

The decision below is an unpublished decision by the Washington State Court of Appeals, Division One, which affirmed a 2013 superior court order denying Stout's CR 60(b)(11) motion to vacate his 2003 commitment as a sexually violent predator. *In re Detention of Stout,* No. 71343-4-I (COA Div. I, June 15, 2015) *(Stout III).* Stout argued that he was entitled to a new trial because the psychiatric profession has now rejected the validity of the Paraphilia Not Otherwise Specified (Non-consent) diagnosis that his commitment was partly based on. The Court of Appeals rejected this argument and held that Stout failed to demonstrate that ongoing disputes about the validity of the diagnosis constitute extraordinary circumstances warranting relief under CR 60(b)(11).

III. ISSUE PRESENTED FOR REVIEW

This Court should deny review because *Stout III* does not present any significant constitutional questions or issues of substantial public interest. However, if the Court were to accept review, Stout raises the following issue:

Whether Stout may bring a motion to vacate his sexually violent predator commitment order under CR 60(b)(11) nearly ten years after

entry of the order, where his motion was based on allegedly new evidence and not extraordinary circumstances, and where the diagnosis relied on as a basis for commitment remains a valid diagnosis?

IV. STATEMENT OF THE CASE

A. Factual Background

Roy Stout has a lengthy history of approaching strangers or casual acquaintances for sex and becoming violent when rebuffed. CP at 117. He also has a substantial criminal history of other criminal behavior, starting at age fourteen and continuing into adulthood, including offenses of theft, arson, assault, forgery, and burglary. *Id.*

On August 30, 1990, Stout met J.G. through an acquaintance and offered to give her a ride home. CP at 118-19. While en route, he stopped the vehicle and forced J.G. to have sexual intercourse with him. *Id.* Stout pleaded guilty to an amended charge of assault in the third degree for causing bodily harm to an adult female by having intercourse without consent. CP at 119. The court sentenced him to seven months in jail. *Id.*

On January 21, 1992, Stout approached a female stranger, K.O., in her car and offered her twenty dollars to feel her "pussy." CP at 119-20. When she refused, Stout grabbed her arm and threatened to break it. CP at 120. Stout then grabbed her breast. *Id.* K.O. managed to push him away

and escape. *Id.* A jury convicted Stout of indecent liberties by forcible compulsion. *Id.* The court sentenced him to 68 months in prison. *Id.*

During the spring of 1997, Stout met T.D. after delivering firewood to the home she shared with her husband and three children. CP at 121. In June 1997, Stout unexpectedly visited T.D. in the hospital late one night after she delivered her baby. CP at 121-22. T.D. was uncomfortable with the unexpected visit and a nurse asked Stout to leave. CP at 122. On July 6, 1997, T.D. was home with her four children when Stout showed up to visit. *Id.* Stout directed the three older children to leave the room and placed his hand on T.D.'s thigh. *Id.* Stout then placed his hand on T.D.'s breast and tried to force his tongue in her mouth. *Id.* Stout pushed T.D. against the couch by pressing his hand on her throat, which left a bruise. *Id.* T.D. told Stout "No" and eventually got away from him. *Id.* He then left the residence. *Id.* Stout pleaded guilty to an amended charge of burglary in the first degree for entering or remaining unlawfully in the residence and assaulting T.D. CP at 123. The court sentenced Stout to 75 months in prison. *Id.*

On October 2, 2001, the State filed a sexually violent predator (SVP) petition against Stout. CP at 116. At Stout's 2003 initial commitment trial, the State's expert, Dr. Richard Packard, testified that Stout suffers from a mental disorder known as Paraphilia Not Otherwise

Specified (NOS) (Non-consent), which is chronic and long-standing. CP at 124-25. He also testified that Stout suffers from Antisocial Personality Disorder. CP at 125. After conducting a comprehensive risk assessment, Dr. Packard concluded that Stout is likely to sexually reoffend. *See id.* The trial court found that Stout suffers from a mental abnormality (Paraphilia NOS, Non-consent) and Antisocial Personality Disorder that make him likely to engage in predatory acts of sexual violence if not confined in a secure facility. CP at 125-26. The court committed Stout to the custody of the Department of Social and Health Services (DSHS) for placement in a secure facility for control, care, and treatment. CP at 126.

Since Stout's civil commitment in 2003, DSHS evaluators have examined Stout's mental condition annually and have continued to conceptualize his array of mental disorders in a similar fashion as noted by Dr. Packard. *See* CP at 467-70, 486-87, 509-10, 533-34, 564-68, 593-94, 136-37, 250-51, 430. Stout has consistently refused to participate in sex offender treatment at the Special Commitment Center. CP at 124.

B. Procedural History

On October 2, 2001, the State filed its SVP petition. CP at 116. After a September 2003 bench trial, the trial court found that Stout is an SVP and committed him to the custody of DSHS for control, care, and treatment. CP at 126-27. Stout's commitment was affirmed on appeal. *In*

re Detention of Stout, 128 Wn. App. 21, 114 P.3d 658 (2005) *(Stout I) aff'd,* 159 Wn.2d 357, 150 P.3d 86 (2007) *(Stout II).*

Since his 2003 commitment, DSHS has evaluated Stout's mental condition annually pursuant to RCW 71.09.070. Each year, Stout refused to participate in the annual review interview and evaluation. CP at 467, 486, 508, 533, 564, 593, 136, 255, 430. Stout has never participated in any sex offender treatment, including treatment available to him at the Special Commitment Center. CP at 135, 248, 425, 558, 561-62, 591. Each annual review concluded that Stout continues to meet criteria as an SVP.[1] *See* CP at 471-72, 488-89, 513, 538, 579, 600, 142, 256, 433.

On August 22, 2013, nearly ten years after Stout's initial commitment, Stout filed a motion to vacate his commitment order, relying on CR 60(b)(11). CP at 276-361. He claimed that he was entitled to a new trial due to a change in the psychiatric community's acceptance of one of his diagnoses and erroneous application of it. CP at 278-86. In support of his motion, Stout attached a May 2013 report from his expert. CP at 302-37. He also attached one academic article from 2008 that criticized the Paraphilia NOS (Non-Consent) diagnosis. CP at 339-48. The State filed a

[1] "Sexually violent predator" means "any person who has been convicted of or charged with a crime of sexual violence and who suffers from a mental abnormality or personality disorder which makes the person likely to engage in predatory acts of sexual violence if not confined in a secure facility." RCW 71.09.020(18).

Memorandum in Response requesting that the court deny Stout's motion. CP at 362-440.

At the hearing on the motion, Stout argued that the psychiatric community has now completely rejected the Paraphilia NOS (Non-Consent) diagnosis that formed the primary basis of his commitment and that this constituted "extraordinary circumstances" under CR 60(b)(11) justifying a new trial. *Stout III*, 2015 WL 3766676 at 1. On December 3, 2013, the trial court entered an order denying Stout's request for a new trial. CP at 451-52. The trial court concluded that Stout failed to identify extraordinary circumstances warranting relief under CR 60(b)(11). *Stout III*, 2015 WL 3766676 at 2. Stout timely appealed and Division One affirmed. CP at 453-55; *Stout III,* 2015 WL 3766676. Stout now petitions this Court for review of *Stout III.*

V. REASONS WHY REVIEW SHOULD BE DENIED

A. Standard For Accepting Review

Stout relies on RAP 13.4(b)(3) and RAP 13.4(b)(4) in his petition for review. Under these provisions, Stout must show (1) that there is a significant question of law under the Washington or United States Constitution; or (2) that there is an issue of substantial public interest that should be determined by the Supreme Court. This Court should deny

review because *Stout III* does not present any significant constitutional questions or issues of substantial public interest.

B. The Court Of Appeals Correctly Affirmed The Trial Court's Denial Of Stout's CR 60(B)(11) Motion To Vacate His 2003 Order Of Commitment As A Sexually Violent Predator

1. Stout's CR 60(B) Motion Is Time-Barred Because It Was Filed Ten Years After Entry Of The Order

CR 60(b) permits a trial court to relieve a party from a final judgment or order for several enumerated reasons, including newly discovered evidence.[2] A motion alleging newly discovered evidence must be made "not more than one year" after entry of the order. CR 60(b). Stout's claim that the psychiatric community has now completely rejected the validity of the Paraphilia NOS (Non-consent) diagnosis is an evidentiary argument governed by CR 60(b)(3). The Court of Appeals correctly concluded that Stout's arguments were allegations of newly discovered evidence under CR 60(b)(3). *See Stout III,* 2015 WL 3766676 at 2. Thus, Stout was required to bring this motion within one year of his October 2003 commitment order. *See* CR 60(b). Instead, Stout waited until 2013, nearly ten years after entry of the order, to raise the motion. His motion is time-barred under CR 60(b)(3).

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[2] CR 60(b)(3) involves newly discovered evidence which by due diligence could not have been discovered in time to move for a new trial under CR 59(b).

2. Stout Is Not Entitled To Relief Under CR 60(B)(11) Because: (1) His Motion Was Not Made Within A Reasonable Time; And (2) The Debate Surrounding Paraphilia Not Otherwise Specified (Non-Consent) Does Not Constitute Extraordinary Circumstances

Stout attempts to circumvent the one-year time limit by instead relying on CR 60(b)(11).[3] However, CR 60(b)(11) cannot be used to circumvent the one-year time limit. *See Friebe v. Supancheck,* 98 Wn. App. 260, 267, 992 P.2d 1014 (1999). Moreover, a party can only move to vacate an order under CR 60(b)(11) when the circumstances do not permit moving under another subsection of CR 60(b). *In re Detention of Ward,* 125 Wn. App. 374, 379, 104 P.3d 751 (2005). Because Stout should have filed this motion under CR 60(b)(3) within one year of entry of the order, he is not permitted to request relief under CR 60(b)(11).

CR 60(b)(11) is "a catch-all provision, intended to serve the ends of justice in extreme, unexpected situations." *Ward,* 125 Wn. App. at 379. The use of CR 60(b)(11) should be confined to situations involving "extraordinary circumstances not covered by any other section of the rule." *In re Marriage of Yearout,* 41 Wn. App. 897, 902, 707 P.2d 1367 (1985).

Furthermore, CR 60(b)(11) motions must be made within a "reasonable time." CR 60(b). In *Ward,* the court held that ten years

[3] CR 60(b)(11) permits the court to vacate an order for "[a]ny other reason justifying relief from the operation of the judgment."

between the change in law and Ward's motion to vacate judgment was an unreasonable amount of time. *Ward,* 125 Wn. App. at 380; *see also Kingery v. Dept. of Labor and Industries*, 132 Wn.2d 162, 177, 937 P.2d 565 (1997) (holding that eight years is too long to justify relief from judgment under CR 60(b)(11)).

Here, Stout waited until 2013, nearly ten years after entry of the 2003 commitment order, to file a CR 60(b) motion. This motion was not made within a reasonable time.[4] The Court of Appeals correctly concluded that Stout's arguments did not constitute extraordinary circumstances under CR 60(b)(11). *Stout III,* 2015 WL 3766676 at 2. The debate surrounding the Paraphilia NOS (Non-consent) diagnosis as a basis for SVP commitment is not new. *See Stout III,* 2015 WL 3766676 at 2-3. This Court has already rejected the argument that Paraphilia NOS (Non-consent) is not a valid diagnosis. *See In re Pers. Restraint of Young,* 122 Wn.2d 1, 27-30, 857 P.2d 989 (1993). The debate surrounding the diagnosis existed at the time of Stout's initial commitment trial, just as it still exists today. The Court of Appeals correctly affirmed the trial court's denial of Stout's CR 60(b)(11) motion. There is no basis for review.

[4] The one academic article Stout presented to the trial court was published in 2008. Waiting five years after publication of this article is also not within a reasonable time period.

Citing to *Foucha v. Louisiana* and *Kansas v. Hendricks,* Stout claims that he "has a fundamental liberty interest in not being indefinitely detained." Petition for Review at 12. This is an inaccurate statement of the law, and these cases do not stand for this proposition. Stout has a liberty interest in being held only as long as he is both mentally ill *and* dangerous. *Kansas v. Hendricks,* 521 U.S. 346, 356-58, 117 S. Ct. 2072, 138 L.Ed.2d 501 (1997); *see also Foucha v. Louisiana,* 504 U.S. 71, 77, 112 S. Ct. 1780, 118 L.Ed.2d 437 (1992) ("the acquittee may be held as long as he is both mentally ill and dangerous, but no longer.") Stout's assertion that he is being held "beyond constitutional limits" is without merit. *See* Petition for Review at 12.

C. Paraphilia Not Otherwise Specified (Non-Consent) Remains A Valid Diagnosis And Any Debate Surrounding The Diagnosis Does Not Present A Significant Constitutional Question Or Issue Of Substantial Public Interest

1. Paraphilia Not Otherwise Specified (Non-Consent) Remains A Valid Diagnosis And Has Not Been Rejected By The Scientific Community

Stout argues that this Court should accept review because Stout was committed "based on a diagnostic label rejected by the scientific community" and that this raises a significant constitutional question and issue of substantial public interest. Petition for Review at 5. Stout's petition is based on the false premise that the diagnosis of Paraphilia NOS

(Non-consent) has been rejected by the scientific community. On the contrary, Paraphilia NOS (Non-consent) remains a valid diagnosis and experts in the relevant scientific community continue to assign this diagnosis to Respondents in SVP cases. As Division One correctly concluded, the trial court did not abuse its discretion in denying Stout's motion to vacate his commitment because Stout failed to demonstrate that ongoing disputes about the validity of the diagnosis constitute extraordinary circumstances justifying relief. *See Stout III,* 2015 WL 3766676 at 4. Stout fails to raise any issue that meets the criteria for review by this Court.

As the Court of Appeals correctly noted, challenges to the Paraphilia NOS (Non-consent) diagnosis as a basis for SVP commitment are not new. *Stout III,* 2015 WL 3766676 at 2. Despite such challenges, Washington appellate courts have repeatedly upheld SVP commitments based on a diagnosis of Paraphilia NOS (Non-consent). *Young,* 122 Wn.2d at 27-33; *In re Detention of Berry,* 160 Wn. App. 374, 379-80, 248 P.3d 592 (2011) citing *In re Detention of Post,* 145 Wn. App. 728, 756-57 &

n.18, 187 P.3d 803 (2008).[5] Furthermore, the diagnosis is widely accepted across the United States. *See McGee v. Bartow*, 593 F.3d 556, 581 n.16 (Wis. 2010).

2. SVP Commitments Are Constitutional Whether Or Not A Diagnosis Is Defined In The Diagnostic And Statistical Manual Of Mental Disorders

There is no requirement that a disorder must be explicitly defined in the Diagnostic and Statistical Manual of Mental Disorders (DSM) to be a valid diagnosis, and Stout cites to no authority for such a claim. Due process does not require states to define "mental disorder" or similar terms consistently with standards of the mental health community. *Kansas v. Hendricks,* 521 U.S. at 358-59.[6] The United States Supreme Court noted

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[5] *See e.g. In re Detention of Aqui*, 84 Wn. App. 88, 94, 929 P.2d 436 (1996); *In re Detention of Campbell*, 139 Wn.2d 341, 357, 986 P.2d 771 (1999); *In re Detention of Mathers*, 100 Wn. App. 336, 336-37, 998 P.2d 336 (2000); *In re Detention of Strauss*, 106 Wn. App. 1, 6, 20 P.3d 1022 (2001); *In re Detention of Hoisington*, 123 Wn. App. 138, 143, 94 P.3d 318 (2004); *In re Detention of Marshall*, 156 Wn.2d 150, 155, 125 P.3d 111 (2005); *In re Detention of Broten*, 130 Wn. App. 326, 332, 122 P.3d 942 (2005); *In re Detention of Halgren*, 156 Wn.2d 795, 800-01, 132 P.3d 714 (2006); *In re Detention of Taylor*, 132 Wn. App. 827, 832, 134 P.3d 254 (2006); *In re Detention of Stout*, 159 Wn.2d 357, 363-64, 150 P.3d 86 (2007); *In re Detention of Paschke*, 136 Wn. App. 517, 520, 150 P.3d 586 (2007); *In re Detention of Moore,* 167 Wn.2d 113, 118, 216 P.3d 1015 (2009); *In re Detention of Alsteen,* 159 Wn. App. 93, 97, 244 P.3d 991 (2010); *In re Detention of McGary,* 155 Wn. App. 771, 777, 231 P.3d 205 (2010); *In re Detention of Berry,* 160 Wn. App. 374, 376, 248 P.3d 592 (2011); *In re Detention of Mines,* 165 Wn. App. 112, 119, 266 P.3d 242 (2011); *In re Detention of Mitchell,* 160 Wn. App. 669, 671, 249 P.3d 662 (2011); *In re Detention of Ticeson,* 159 Wn. App. 374, 378, 246 P.3d 550 (2011); *In re Detention of Coe,* 175 Wn.2d 482, 489, 286 P.3d 29 (2012); *State v. McCuistion,* 174 Wn.2d 369, 375-76, 275 P.3d 1092 (2012); *In re Pers. Restraint of Meirhofer,* 182 Wn.2d 632, 644, 343 P.3d 731 (2015).

[6] Kansas' sexually violent predator law, which was modeled after RCW 71.09, allows civil commitment of individuals who are likely to engage in predatory acts of sexual violence due to a "mental abnormality" or "personality disorder". *Kansas v. Hendricks,* 521 U.S. at 350.

that "psychiatrists disagree widely and frequently on what constitutes mental illness" and that the Court itself has used a variety of expressions to describe the mental condition of those subject to civil commitment. *Id.* at 359.

The Court rejected Hendricks' claim that the use of the term "mental abnormality" in the Kansas SVP law did not comport with earlier cases requiring a finding of "mental illness". *Id.* at 358-59 ("we have never required state legislatures to adopt any particular nomenclature in drafting civil commitment statutes.") The Court concluded the law was constitutional and complied with earlier cases upholding civil commitment based on a finding of dangerousness and the presence of a mental abnormality or mental illness. *Id.*

This Court has held that civil commitment statutes are constitutional when confinement is predicated on the individual's mental abnormality and dangerousness. *State v. McCuistion,* 174 Wn.2d 369, 387, 275 P.3d 1092 (2012). In order to commit an individual as an SVP, the State must show that the person has been convicted of a crime of sexual violence and "suffers from a mental abnormality or personality disorder which makes the person likely to engage in predatory acts of sexual violence if not confined in a secure facility." RCW 71.09.020(18). "Mental abnormality" is defined as "a congenital or acquired condition

affecting the emotional or volitional capacity which predisposes the person to the commission of criminal sexual acts in a degree constituting such person a menace to the health and safety of others." RCW 71.090.020(8).

There is simply no requirement that a "mental abnormality" be defined in the DSM. *See Young,* 122 Wn.2d at 27-28 (Although "mental abnormality" is not defined in the DSM-III-R, the Legislature has given it a meaning that incorporates a number of recognized mental pathologies.) Washington's definition of "mental abnormality" meets constitutional requirements and does not place the limitations on acceptable diagnoses that Stout would have this Court impose.

Recognizing the limitations of the DSM and the political nature of the debate surrounding certain diagnoses, this Court has rejected the argument that a diagnosis is invalid if not listed in the DSM:

> In using the concept of 'mental abnormality' the legislature has invoked a more generalized terminology that can cover a much larger variety of disorders. Some, such as the paraphilias, are covered in the DSM–III–R; others are not. The fact that pathologically driven rape, for example, is not yet listed in the DSM–III–R does not invalidate such a diagnosis. The DSM is, after all, an evolving and imperfect document. Nor is it sacrosanct. Furthermore, it is in some areas a political document whose diagnoses are based, in some cases, on what American Psychiatric Association ("APA") leaders consider to be practical realities. *What is critical for our purposes is that psychiatric and psychological clinicians who testify in good faith as to*

> *mental abnormality are able to identify sexual pathologies that are as real and meaningful as other pathologies already listed in the DSM.*

Young, 122 Wn.2d at 28 (emphasis in original). Thus, this Court has recognized that the DSM is not sacrosanct and that the critical issue is whether an expert can "identify sexual pathologies that are as real and meaningful as other pathologies already listed in the DSM." *See id.*

As recently as 2011, Washington courts have recognized that criticism of the Paraphilia NOS (Non-Consent) diagnosis does not mean it is no longer a generally accepted diagnosis. *See Berry,* 160 Wn. App. at 380 ("Though Berry identifies scientific criticism of the criteria and reliability of the diagnosis, he does not establish that it is no longer generally accepted.") Disputes amongst experts about the validity of the diagnosis go to the weight of the evidence, not its admissibility. *Id.* at 382. Stout fails to cite to any authority suggesting that the DSM governs the diagnosis of "mental abnormality" that is the basis for commitment as an SVP. Stout fails to demonstrate that there is a significant constitutional question of law or issue of substantial public interest and this Court should deny review.

3. The Status Of Paraphilia Not Otherwise Specified (Non-Consent) As A Formal Diagnosis Justifying Civil Commitment Has Not Changed Since Stout's Initial Commitment

Stout argues that he is entitled to a new trial because Paraphilia NOS (Non-consent) was considered, but rejected, for inclusion in the latest version of the DSM.[7] *See* Petition for Review at 6. What Stout fails to acknowledge is that a similar diagnosis of paraphilic coercive disorder[8] was previously considered for inclusion in the 1985 version of the DSM, but ultimately rejected. CP at 344. At the time, there was significant debate about categorizing rape behavior as a mental disorder and concern that such a disorder could be used in forensic settings to exculpate rapists. *Id.* Consequently, the disorder was not included in the DSM-III-R. *Id.* Similarly, Paraphilia NOS (Non-consent) was not included in the DSM-IV-TR[9] at the time of Stout's 2003 commitment trial, just as it is not included in the latest version of the DSM. Thus, the status of Paraphilia NOS (Non-consent) as a formal DSM diagnosis has not changed since Stout's commitment trial.

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[7] The latest version is DSM-V, which was published in 2013. American Psychiatric Association, *Diagnostic and Statistical Manual of Mental Disorders,* (5th Ed. 2013) (DSM-V).

[8] Paraphilia NOS (Non-consent) is also referred to as Paraphilia NOS (Rape) and Paraphilic Coercive Disorder.

[9] The DSM-IV-TR was published in 2000. American Psychiatric Association, *Diagnostic and Statistical Manual of Mental Disorders,* (4th Ed. 2000) (DSM-IV-TR).

The only academic article Stout presented to the trial court was a 2008 article criticizing the Paraphilia NOS (Non-consent) diagnosis.[10] CP 338-48. The Court of Appeals noted that Stout relied heavily on this article criticizing the diagnosis. *Stout III,* 2015 WL 3766676 at 2. However, that article acknowledged the long standing debate over the diagnosis and recognized that it could be an appropriate diagnosis for some individuals:

> This distinction does not mean that paraphilia NOS cannot or should not be used to describe some individuals who commit coercive sexual acts.

CP at 344.[11] Dr. Frances goes on to write that "[t]he two areas of controversy, paraphilia NOS and antisocial personality disorder, may be appropriate in some circumstances and inappropriate in others." CP at 346-47.[12] Thus, the only article relied on by Stout before the trial court indicates that the diagnosis has not been "rejected" by the scientific community, but rather remains a valid diagnosis for certain individuals. Stout has failed to demonstrate that there is any significant constitutional

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[10] It should be noted that none of the 2011 articles Stout cites to on appeal or in his petition for review were before the trial court for consideration.

[11] Allen Frances, Shoba Sreenivasan, & Linda E. Weinberger, *Defining Mental Disorder When It Really Counts: DSM-IV-TR and SVP/SDP Statutes*, 36 J. Am. Acad. Psychiatry Law (Sept. 2008).

[12] It is interesting to note that Stout elected not to cite to this article in his petition for review.

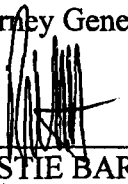
question of law or issue of substantial public interest and this Court should deny review.

VI. CONCLUSION

Stout has not established a basis for review by this Court. The State respectfully requests that the Court deny his petition for review.

RESPECTFULLY SUBMITTED this 8th day of September, 2015.

ROBERT W. FERGUSON
Attorney General



KRISTIE BARHAM
WSBA #32764 / OID # 91094
Assistant Attorney General
Attorneys for Respondent

NO. 91944-5

WASHINGTON STATE SUPREME COURT

In re the Detention of: Roy Stout, Petitioner.	DECLARATION OF SERVICE

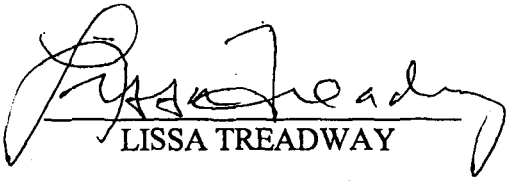
I, Lissa Treadway, hereby declare as follows:

On the 8th day of September, 2015, pursuant to the Electronic Service Agreement between the parties, I sent via electronic transmission a true and correct copy of the State of Washington's Answer to Petition for Review and Declaration of Service addressed as follows:

Mick Woynarowski
Washington Appellate Project
mick@washapp.org
wapofficemail@washapp.org

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

DATED this 8th day of September, 2015, at Seattle, Washington.



LISSA TREADWAY

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Subject: Detention of Roy Stout, WSSC Case No. 91944-5

Good afternoon. I attach the following documents for filing in Case No. 91944-5, Detention of Roy Stout.

- State of Washington's Answer to Petition for Review
- Declaration of Service

Filed on behalf of:

AAG Kristie Barham
WSBA # 32764 / OID # 91094
(206) 389-2004

Please contact our office with any questions.

Lissa Treadway | Legal Assistant to AAGs Kristie Barham, Brooke Burbank, Thomas Howe & Melanie Tratnik
Office of The Attorney General | Criminal Justice Division
800 Fifth Avenue | Suite 2000 | Seattle WA 98104
206.389.3010 | LissaT@atg.wa.gov

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