

FILED
SUPREME COURT
STATE OF WASHINGTON
2/16/2018 11:43 AM
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SUPREME COURT
OF THE STATE OF WASHINGTON

SWANSON HAY COMPANY, a
Washington corporation, HATFIELD
ENTERPRIZES, INC., a Washington
corporation, and SYSTEM-TWT
TRANSPORT, a Washington corporation,

Petitioners,

v.

STATE OF WASHINGTON
EMPLOYMENT SECURITY
DEPARTMENT,

Respondent.

No. 95246-9

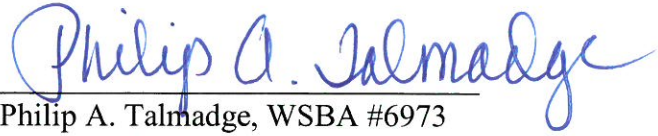
STATEMENT OF
ADDITIONAL
AUTHORITY

COME NOW the petitioners Hatfield Enterprizes and System-TWT
Transport and submit the following additional authority to the Court
pursuant to RAP 10.8:

- *In re Personal Restraint of Arnold*, __ Wn.2d __, __ P.3d __
2018 WL 894468 (2018) (Court rejects concept of horizontal
stare decisis as to decisions of divisions of Court of Appeals;
Division III here was affected by *stare decisis*, principles at
least to some degree in applying Division I's *Western Ports*
analysis (1 Wn. App. 2d at 209).

DATED this 16th day of February, 2018.

Respectfully submitted,



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Attorneys for Petitioners
System-TWT Transport and Hatfield
Enterprizes, Inc.

DECLARATION OF SERVICE

On said day below I electronically served a true and accurate copy of the *Statement of Additional Authority* in Supreme Court Cause No. 95246-9 to the following parties:

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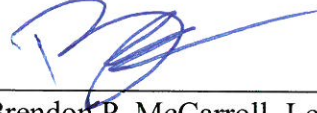
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Original E-filed with:
Supreme Court
Clerk's Office

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

Dated this 16th day of February, 2018 at Seattle, Washington.



Brendon P. McCarroll, Legal Assistant
Talmadge/Fitzpatrick/Tribe

TALMADGE/FITZPATRICK/TRIBE

February 16, 2018 - 11:43 AM

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: 95246-9
Appellate Court Case Title: Swanson Hay Company v. Employment Security Department
Superior Court Case Number: 15-2-03704-2

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Comments:

Statement of Additional Authority

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