

NO. 48268-1-II

IN THE COURT OF APPEALS OF WASHINGTON
DIVISION II

STATE OF WASHINGTON

Respondent,

vs.

A.G.,

Appellant.

BRIEF OF RESPONDENT

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Findings of Fact and Conclusions of Law should enter in this matter so Defense Counsel can provide this Court with a substantive brief on any issues that need to be addressed1

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A. ASSIGNMENTS OF ERROR

ISSUE STATEMENT

Whether Findings of Fact and Conclusions of Law should enter in this matter so Defense Counsel can provide this Court with a substantive brief on any issues that need to be addressed?

B. STATEMENT OF THE CASE

Appellant's Statement of the Case is accurate in that Findings of Fact and Conclusions of Law had not been entered at the time of Appellant's Brief.

C. SUMMARY OF ARGUMENT

Findings of Fact and Conclusions of Law should enter in this matter so Defense Counsel can provide this Court with a substantive brief on any issues that need to be addressed.

D. ARGUMENT

Unfortunately Findings of Fact and Conclusions of Law were not entered in this matter pursuant to JuCR 7.11 until after Appellant filed his opening brief.

Now that those Findings of Fact and Conclusions of Law have been entered by the Trial Court, Appellant should be provided additional time to address any substantive issues Appellant and his Counsel deem appropriate.

A Motion to Supplement the Record to include the Findings of Fact and Conclusions of Law previously referred to will be filed concomitantly with this brief.

E. CONCLUSION

For the above reasons the State respectfully requests this Court authorize Appellant additional time to prepare a substantive brief addressing any issues he and his Counsel deem appropriate; said period of time to prepare Appellant's brief to be at this Court's discretion.

The State for its part, apologizes to this Court and Appellant for the delays associated with this response.

Respectfully submitted this 25th day of August, 2016.



MICHAEL E. HAAS, WSBA #17663
Jefferson County Prosecuting Attorney
Attorney for Respondent

PROOF OF SERVICE

I, Sarah Martin, certify that on this date:

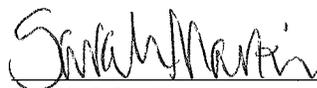
I filed the State's BRIEF OF RESPONDENT electronically with the Court of Appeals, Division II, through the Court's online filing system.

I delivered an electronic version of the brief, using the Court's filing portal, to:

Ms. Lisa Tabbut
ltabbutlaw@gmail.com

I CERTIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.

Signed at Port Townsend, Washington on this 25th day of August, 2016.



Sarah Martin
Senior Legal Assistant

JEFFERSON DISTRICT COURT

August 25, 2016 - 4:21 PM

Transmittal Letter

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Case Name: State of Washington v. A.G.

Court of Appeals Case Number: 48268-1

Is this a Personal Restraint Petition? Yes No

The document being Filed is:

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Motion: _____

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Brief: Respondent's

Statement of Additional Authorities

Cost Bill

Objection to Cost Bill

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Letter

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Hearing Date(s): _____

Personal Restraint Petition (PRP)

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Comments:

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