

COURT OF APPEALS
DIVISION TWO
OF THE STATE OF WASHINGTON

FILED
COURT OF APPEALS
DIVISION II
2016 JUN 29 AM 11:19
STATE OF WASHINGTON
BY C
DEPUTY

STATE OF WASHINGTON)
)
Respondent,)
)
v.)
)
MARVIN MEADOWS)
(your name))
)
Appellant.)

No. 48373-4-11

STATEMENT OF ADDITIONAL
GROUND FOR REVIEW

I, MARVIN MEADOWS, have received and reviewed the opening brief prepared by my attorney. Summarized below are the additional grounds for review that are not addressed in that brief. I understand the Court will review this Statement of Additional Grounds for Review when my appeal is considered on the merits.

Additional Ground 1

The prosecution submitted a motion to suppress "hearsay" the day that trial preparations began. Defense Attorney David Shaw objected to said motion stating "the case against Meadows (Defendant) is based on "hearsay". Judge Castello noted the motion and the objection and sent court into recess until the next day, stating that "he would rule on it in the morning". This was done in open court, but he never ruled on it. At least not in open court. We proceeded to trial without a ruling on the prosecution's motion or the defense's objection.

Additional Ground 2

Ineffective Assistance of Counsel: Defense Attorney David Shaw never submitted a "motion for suppression" in writing, even though asked to on many occasions before trial started. Also, Attorney David Shaw never reviewed video evidence submitted by defendant Meadows, even though he received it at least two months before the beginning of trial. It was mistformatted and became "still" photographs instead of "streaming" video. He didn't give defendant Meadows a chance to correct that mistake. The evidence presented was ineffective. He also failed to submit it to the prosecution until the day the defense presented its case.

If there are additional grounds, a brief summary is attached to this statement.

Date: 6/24/16

Signature: Marvin Meadows