

FILED
MAR 17 2008

CLERK OF SUPREME COURT
STATE OF WASHINGTON

RECEIVED

SUPREME COURT
STATE OF WASHINGTON

2008 MAR 17 P 3:31

BY RONALD R. CARPENTER

CLERK

IN THE SUPREME COURT FOR THE
STATE OF WASHINGTON

STATE OF WASHINGTON,
Plaintiff/Respondent,

v.

JEREMY GRANDE,
Defendant/Appellant.

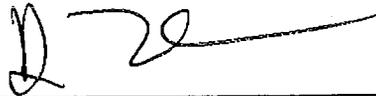
No. 81068-1
Court of Appeals No. 59848-1-I

STATEMENT OF ADDITIONAL
AUTHORITIES

Pursuant to RAP 10.8, Appellant submits the following additional persuasive authority in support of his argument that Maryland v. Pringle, 540 U.S. 366, 124 S. Ct. 795, 157 L. Ed. 2d 769 (2003), is distinguishable from this case:

United States v. Humphries, 372 F.3d 653, 659 (4th Cir. 2004) (“But probable cause to believe that marijuana is located in an automobile or an apartment may not automatically constitute probable cause to arrest all persons in the automobile or apartment; some additional factors would generally have to be present, indicating to the officer that those persons possessed the contraband. See Pringle, 124 S.Ct. at 800-01 (holding that the presence of cocaine and a roll of money in the passenger area of an automobile gave officers probable cause to believe that the automobile's occupants jointly committed the crime of possession of cocaine)”).

1 DATED this 17th day of March, 2008.

2 

3 David B. Zuckerman, WSBA 18221
4 Attorney for Jeremy Grande
5 Law Office of David B. Zuckerman
6 705 Second Avenue, Suite 1300
7 Seattle, WA 98104
8 (206) 623-1595

9 **FILED AS ATTACHMENT
10 TO EMAIL**

11 **CERTIFICATE OF SERVICE**

12 I hereby certify that on the date listed below I served by the method indicated one copy of
13 the foregoing Statement of Additional Authorities on the following:

14 **BY EMAIL & U.S. MAIL**
15 Ms. Toni G. Montgomery
16 Deputy Skagit County Prosecutor
17 Skagit County Prosecutor's Office
18 605 South 3rd Street – Courthouse Annex
19 Mount Vernon, WA 98273
20 Email: tonig@co.skagit.wa.us

21 **BY U.S. MAIL**
22 Mr. Jeremy Grande
23 PO Box 774
24 Burlington, WA 98233

25 3/17/08

Date



David B. Zuckerman