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SUPREME COURT
STATE OF WASHINGTON

No. 81812-6

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BY RONALD R. CARPENTER

IN THE SUPREME COURT
OF THE STATE OF WASHINGTON

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Court of Appeals No. 60158-0-I

ANDREA SHOEMAKE, by and through JULIE SCHISEL,
Guardian ad Litem, and KEITH SHOEMAKE, and their marital
community,

Respondents/Cross-Petitioners,

v.

R. DOUGLAS P. FERRER and JANE DOE FERRER, husband
and wife

Petitioner/Cross-Respondent.

RESPONDENTS' SECOND STATEMENT OF
ADDITIONAL AUTHORITY

Law Offices of Robert B. Gould
Robert B. Gould, WSBA No. 4353
Brian J. Waid, WSBA No. 26038
2110 N. Pacific Street, Suite 100
Seattle, WA 98103-9181
(206) 633-4442

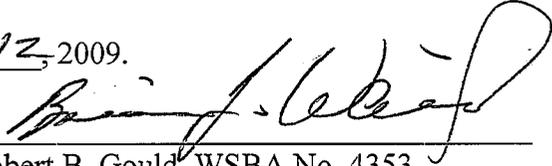
Attorneys for Respondents/Cross-Petitioners

Pursuant to RAP 10.8, Respondents Andrea and Keith Shoemake respectfully submit and request consideration of *Leonard v. Dorsey & Whitney, LLP*, 553 F.3d 609, 2009 WL 88855 (8th Cir. 1/15/09). *Leonard* reversed on other grounds *In re: SRC Holding Corp.*, 364 B.R. 1 (D. Minn. 2007) cited in Mr. and Mrs. Shoemakes' Supplemental Brief, at pp. 12, 18 and 19.

Respondents also submit and request consideration of *Fred Hutchinson Cancer Research Center v. Holman*, 107 Wn.2d 693, 710-11, 732 P.2d 974 (1987), which relates to the issue discussed in Mr. and Mrs. Shoemakes' Supplemental Brief, at p. 3 n. 1.

DATED: February 12, 2009.

By: _____


Robert B. Gould, WSBA No. 4353
Brian J. Waid, WSBA No. 26038
LAW OFFICES OF ROBERT B. GOULD
2110 N Pacific Street #100
Seattle, WA 98103
(206) 633-4442
Attorneys for Respondents/Cross Petitioners