

82363-4

No. ~~83923-9~~
RECEIVED VSC
SUPREME COURT
STATE OF WASHINGTON
Jan 23, 2012, 9:44 am
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IN THE SUPREME COURT FOR
THE STATE OF WASHINGTON

IN RE PERSONAL RESTRAINT)
OF:)

SALVADOR RIVERA,)
Petitioner.)

RESPONDENT'S RECEIVED BY E-MAIL
STATEMENT OF
ADDITIONAL
AUTHORITIES

To: Clerk of the Court

Pursuant to RAP 10.8, the State respectfully submits the following
additional authority:

In re Personal Restraint of Coats, ___ Wn.2d ___, (2011), 2011
WL 5593063 on the issues of facial invalidity and prejudice within
the context of a personal restraint petition

In re Personal Restraint of Bonds, 165 Wn. 2d 135, 140,
143, 196 P.3d 672, 677 (2008), on the issue of whether RCW
10.73.090, as a statute of limitations, precludes consideration
of arguments or issues not asserted in the original petition.

DATED this 23rd day of January, 2012.

Respectfully submitted,



HILARY A. THOMAS, WSBA #22007
Appellate Deputy Prosecutor
Attorney for Respondent

Statement of Additional
Authorities - 1

Whatcom County Prosecuting Attorney
311 Grand Avenue, 2nd Floor
Bellingham, WA 98225-4079
(360) 676-6784

ORIGINAL

CERTIFICATE

I certify that on this date I placed in the mail a properly stamped and addressed envelope, or caused to be delivered, a copy of the document to which this Certificate is attached to this Court and Appellant's attorney, Nancy P. Collins, addressed as follows:

**WASHINGTON APPELLATE PROJECT
1511 Third Avenue, Suite 701
Seattle, WA 98101**

Sydney A. Koss 01/23/2012
LEGAL ASSISTANT DATE

OFFICE RECEPTIONIST, CLERK

To: Appellate_Division Appellate_Division; kprocto@co.pierce.wa.us;
PCpatcecf@co.pierce.wa.us; jeffreyerwinellis@gmail.com; nancy@washapp.org
Cc: Hilary Thomas
Subject: RE: AMENDED In re PRP of Rivera No. 83923-9

Rec'd 1/23/2012

Please note that any pleading filed as an attachment to e-mail will be treated as the original. Therefore, if a filing is by e-mail attachment, it is not necessary to mail to the court the original of the document.

From: Appellate_Division Appellate_Division [mailto:Appellate_Division@co.whatcom.wa.us]
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jeffreyerwinellis@gmail.com; nancy@washapp.org
Cc: Hilary Thomas
Subject: AMENDED In re PRP of Rivera No. 83923-9

SUPR CT No. 83923-9

In re Personal Restraint Petition of Salvador Rivera

Attached please find Respondent, State of Washington's, Statement of Additional Authorities in the above-referenced matter. A copy has been served upon Petitioner's counsel and other parties via email and U.S. mail.

Hilary A. Thomas
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Sydney A. Koss, Legal Assistant
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