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SUPREME COURT NO. 83882-8

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

ROBERT PIEL & JACQUELINE PIEL, husband and wife,

Petitioners,

v.

THE CITY OF FEDERAL WAY, a Municipality organized pursuant to
the laws of the State of Washington,

Respondent.

RESPONDENT'S STATEMENT OF ADDITIONAL AUTHORITIES

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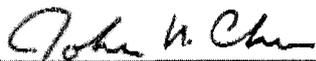
Pursuant to RAP 10.8, Respondent City of Federal Way submits this statement of additional authorities. The following cases, decided after Respondent filed its Brief on April 5, 2010, are relevant to the issue of whether the remedial scheme set forth in RCW 41.56 makes it impossible, as a matter of law, for Petitioners to satisfy the Jeopardy Element of their claim for Wrongful Termination in Violation of Public Policy.

- *Cudney v. ALSCO*, 172 Wn.2d 524, 534 n. 3, 259 P.3d 244 (2011) (“[T]he point of the jeopardy prong of the analysis, . . . is to consider whether the statutory protections are *adequate to protect the public policy*, not whether the claimant could recover more through a tort claim.”) (emphasis in original).
- *Rose v. Anderson Hay & Grain Company*, 168 Wn. App. 474, 276 P.3d 382 (Div. III May 22, 2012) (declining to reject or modify *Korslund v. DynCorp Tri-Cities Services*, 156 Wn.2d 168, 183, 125 P.3d 119 (2005) and holding that the Commercial Motor Vehicle Safety Act, 49 U.S.C. Ch. 311, provides an adequate remedy for protection of public interest.).

DATED this 20th day of August, 2012.

Respectfully submitted,

SUMMIT LAW GROUP PLLC

By 
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CERTIFICATE OF SERVICE

I certify that on the 20th day of August, 2012, I caused a true and correct copy of this Respondent's Statement of Additional Authorities to be served on the following in the manner indicated below:

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DATED this 20th day of August, 2012.



Leslie D. Teves, Legal Assistant

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Case Name: Robert Piel & Jacqueline Piel v. The City of Federal Way
Case Number: 83882-8
Filed by: John H. Chun, (206) 676-7000, WSBA #24767, johnc@summitlaw.com

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