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SUPREME COURT  
STATE OF WASHINGTON

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BY RONALD R. CARPENTER

*bh*  
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SUPREME COURT  
OF THE STATE OF WASHINGTON

MITCH DOWLER and IN CHA  
DOWLER, individually and as limited  
guardian ad litem for NAM SU CHONG,  
*et al.*,

Appellants,

vs.

CLOVER PARK SCHOOL DISTRICT,  
NO 400,

Respondent.

NO. 84048-2

STATEMENT OF  
ADDITIONAL  
AUTHORITIES

COME NOW the appellants and submit the following additional  
authorities to the Court pursuant to RAP 10.8:

- *Sagan v. Sumner Cty. Bd. of Educ.*, \_\_\_ F. Supp.2d \_\_\_,  
2010 WL 2696169 (M.D. Tenn. 2010) (claims alleging  
unlawful force and negligence were not subject to  
administrative exhaustion under the Individuals with  
Disabilities Education Act since the claims arose from non-  
educational injuries, irrespective of the fact that they  
occurred in an educational setting)

DATED this 30th day of August, 2010.

Respectfully submitted,

*Philip A. Talmadge*

Philip A. Talmadge, WSBA #6973  
Emmelyn Hart-Biberfeld, WSBA #28820  
Talmadge/Fitzpatrick  
18010 Southcenter Parkway  
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ATTACHMENT TO EMAIL

ORIGINAL

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4002 Tacoma Mall Blvd, #102  
Tacoma, WA 98409-7702  
(253) 682-3420  
Attorneys for Appellants

DECLARATION OF SERVICE

On this day said below, I deposited with the U.S. Postal Service and sent by email a true and accurate copy of: Statement of Additional Authorities in Supreme Court Cause No. 84048-2 to the following parties:

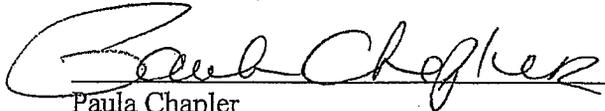
Thaddeus P. Martin IV  
4928 109<sup>th</sup> St. SW  
Lakewood, WA 98499

William A. Coats  
Daniel C. Montopoli  
H. Andrew Saller  
Vandenberg Johnson & Gandara, LLP  
PO Box 1315  
Tacoma, WA 98401-1315

Original efiled with:  
Washington Supreme Court Clerk's Office  
415 12<sup>th</sup> Street W  
Olympia, WA 98504

I declare under penalty of perjury under the laws of the State of Washington and the United States that the foregoing is true and correct.

DATED: August 30, 2010, at Tukwila, Washington.

  
Paula Chapler  
Talmadge/Fitzpatrick

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