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SUPREME COURT
STATE OF WASHINGTON
Oct 24, 2011, 6:02 pm 4:59 pm
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SUPREME COURT
FOR THE STATE OF WASHINGTON

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bjh

WILLIAM H. KIELY and SALLY
CHAPIN-KIELY, husband and wife,

Respondents,

vs.

KENNETH W. GRAVES and KAREN
R. GRAVES, Trustees of the Graves
Family Trust; and all other persons or
parties unknown claiming any right, title,
estate, lien, or interest in the real estate
described in the complaint herein,

Appellants.

NO. 84828-9

STATEMENT OF
ADDITIONAL
AUTHORITIES

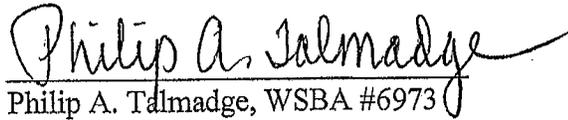
COME NOW the appellants Graves and submits the following
additional authorities to the Court pursuant to RAP 10.8:

- *Wright v. Olsen*, 42 Wn.2d 702, 257 P.2d 782 (1953)
(where State received deed to property for highway
purpose, court held that the property was owned by the
State in fee simple and did not constitute an easement);
- *Miller v. County of King*, 59 Wn.2d 601, 369 P.2d 304
(1962) (under RCW 58.08.015, dedication is to be regarded
as a quit claim deed, divesting donor of all interest in the
property);
- *McDowell v. Beckham*, 72 Wash. 224, 130 Pac. 350 (1913)
(no action for adverse possession against remaindermen
possible during existence of life estate).

ORIGINAL

DATED this 24~~th~~ day of October, 2011.

Respectfully submitted,



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Attorneys for Appellants Graves

DECLARATION OF SERVICE

On said day below I emailed and deposited in the US Mail a true and accurate copy of the following document: Statement of Additional Authorities in Supreme Court Cause No. 84828-9 to the following:

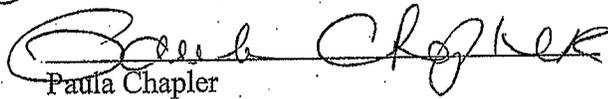
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Original efiled with:
Washington Supreme Court
Clerk's Office
415 12th Street W
Olympia, WA 98504-0929

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: October 27, 2011, at Tukwila, Washington.


Paula Chapler
Talmadge/Fitzpatrick