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SUPREME COURT
STATE OF WASHINGTON
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SUPREME COURT OF
THE STATE OF WASHINGTON

ANGELA ERDMAN,)
)
 Appellant,) No. 84998-6
)
 v.) RESPONDENTS' SECOND
) STATEMENT OF
 CHAPEL HILL PRESBYTERIAN) ADDITIONAL AUTHORITY
 CHURCH; MARK J. TOONE,)
 individually; and the marital)
 community of MARK J. TOONE)
 and "JANE DOE" TOONE,)
)
 Respondents.)
 _____)

Respondents submit this Statement of Additional Authority to bring to the Court's attention the fact that the U.S. Supreme Court recently granted certiorari in *E.E.O.C. v. Hosanna-Tabor Evangelical Lutheran Church & Sch.*, 597 F.3d 769 (6th Cir. 2010), *cert. granted*, 131 S. Ct. 1783 (U.S. 2011).

RESPONDENTS' SECOND STATEMENT OF
ADDITIONAL AUTHORITY - 1

ORIGINAL

According to the Supreme Court, the question presented by *Hosanna-Tabor* is the scope of the ministerial exception:

QUESTION PRESENTED:

The federal courts of appeals have long recognized the "ministerial exception," a First Amendment doctrine that bars most employment-related lawsuits brought against religious organizations by employees performing religious functions. The circuits are in complete agreement about the core applications of this doctrine to pastors, priests, and rabbis. But they are evenly divided over the boundaries of the ministerial exception when applied to other employees. The question presented is: Whether the ministerial exception applies to a teacher at a religious elementary school who teaches the full secular curriculum, but also teaches daily religion classes, is a commissioned minister, and regularly leads students in prayer and worship.

Hosanna-Tabor Evangelical Lutheran Church & Sch. v. E.E.O.C., 131 S. Ct. 1783 (2011) (question presented available at: <http://www.supremecourt.gov/qp/10-00553qp.pdf>).

DATED this 20th day of June, 2011.

VANDEBERG JOHNSON &
GANDARA, LLP

By 
William A. Coats, WSBA #4608
Daniel C. Montopoli, WSBA #26217
Attorneys for Respondents

RESPONDENTS' SECOND STATEMENT OF
ADDITIONAL AUTHORITY - 2

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury under the laws of the State of Washington, that the foregoing is true and correct:

That on June 20, 2011 I placed a copy of the foregoing document in an envelope and sent it

to: Robin Williams Phillips
Sean V. Small
Attorneys at Law
Lasher Holzapfel Sperry & Ebberson, PLLC
2600 Two Union Square
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Seattle, WA 98101-4000

Mr. Bradley A. Maxa
Gordon Thomas Honeywell
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by the following method:

Depositing same postage pre-paid in the United States Mail, first class mail, addressed to the person identified above.

Delivering a copy to Legal Messenger Service, Inc., with appropriate instructions to deliver the same to the person(s) identified above.

Personally delivering copies to the person(s) identified above.

DATED this ___ day of June, 2011, at Tacoma, Washington.


Barbara Anderson

RESPONDENTS' SECOND STATEMENT OF
ADDITIONAL AUTHORITY - 3