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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'
	)	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 pursuant to RAP 10.8:

- *Alcazar v. Corp. of the Catholic Archbishop of Seattle*, 627 F.3d 1288 (9th Cir. 2010) (En Banc) (affirming dismissal of Washington's Minimum Wage Act claim because plaintiff who assisted with mass and performed church maintenance duties was a "minister" subject to the ministerial exception to state and federal employment laws);

RESPONDENTS' STATEMENT OF ADDITIONAL  
AUTHORITY - 1

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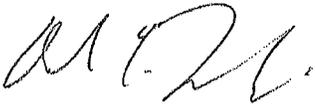
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- *Southeastern Pennsylvania Synod of the Evangelical Lutheran Church in Am. v. Meena*, No. 2498 C.D. 2009, 2011 WL 1485600 (Pa. Commw. Ct. Apr. 18, 2011) (rejecting “neutral principles of law” approach while applying the “polity or deference approach” to resolve ecclesiastical matters);
- *Masterson v. Diocese of Nw. Texas*, No. 03-10-00015-CV, 2011 WL 1005382 (Tex. App. Mar. 16, 2011) (applying ecclesiastical abstention doctrine because “people who unite themselves to a church organization do so with an implied consent that intrachurch conflicts, including property disputes, will be decided by the church”).

DATED this 11<sup>th</sup> day of May, 2011.

VANDEBERG JOHNSON &  
GANDARA, LLP

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

RESPONDENTS' 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 May 11, 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  
601 Union Street  
Seattle, WA 98101-4000

Mr. Bradley A. Maxa  
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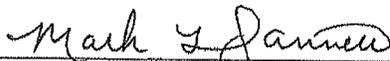
by the following method:

[ X ] 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 11<sup>th</sup> day of May, 2011, at Tacoma, Washington.

  
MARK L. GANNETT

RESPONDENTS' STATEMENT OF ADDITIONAL  
AUTHORITY - 3