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**IN THE SUPREME COURT
OF THE STATE OF WASHINGTON**

MARY FRANKLIN,

Respondent,

v.

JACKIE JOHNSTON,

Petitioner.

**RESPONDENT MARY FRANKLIN'S STATEMENT OF
ADDITIONAL AUTHORITY**

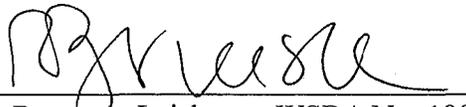
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Mary Franklin

Pursuant to RAP 10.8, Respondent Mary Franklin respectfully submits this Court's recent decision in *In re Dependency of M.S.R.* as additional authority regarding the issue of a child's separate interest in maintaining his or her relationship with a *de facto* parent. *In re Dependency of M.S.R.*, __ Wn.2d ___, 2012 WL 664005 at *9 (March 1, 2012) ("children have fundamental liberty interests," including an interest "in maintaining the integrity of the family relationships, including the child's parents, siblings, and other familiar relationships"). *See also Santosky v. Kramer*, 455 U.S. 745, 760, 102 S.Ct. 1388, 71 L.Ed.2d 599 (1982) ("the child and his parents share a vital interest in preventing erroneous termination of their natural relationship"); *Duchesne v. Sugarman*, 566 F.2d 817, 825 (2d Cir. 1977) (the "right to the preservation of family integrity encompasses the reciprocal rights of both parent and children," including the interest of a child "in not being dislocated from the 'emotional attachments that derive from the intimacy of daily association' with the parent"). (citations omitted).

RESPECTFULLY SUBMITTED this 7th day of March, 2012.

DAVIS WRIGHT TREMAINE LLP

By 
Roger A. Leishman, WSBA No. 19971
Christina Chan, WSBA No. 44094

CERTIFICATE OF SERVICE

I, Keith Morton, the undersigned, hereby certify and declare under penalty of perjury under the laws of the State of Washington that the following statements are true and correct. I am over the age of 18 years and not a party to the within cause. I am employed by the law firm of Davis Wright Tremaine LLP and my business and mailing addresses are both 1201 Third Avenue, Suite 2200, Seattle, Washington 98101-3045.

On March 7, 2012, I caused to be served the attached document entitled **RESPONDENT MARY FRANKLIN'S STATEMENT OF ADDITIONAL AUTHORITY** to the following individuals:

Via First Class U.S. Mail:

Original and one copy
Washington State Supreme Court
415—12th Avenue SW, PO Box 40929
Olympia, WA 98504

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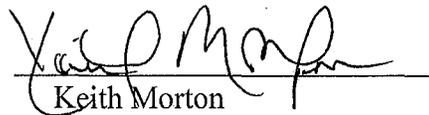
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I certify under penalty of perjury under the laws of the State of
Washington that the foregoing is true and correct.

Executed this 7th day of March, 2012, at Seattle, Washington.


Keith Morton