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

In re the Custody of:

B.M.H., CHILD

MICHAEL HOLT

Respondent,

and

LAURIE HOLT

Petitioner.

No. 86895-6

STATEMENT OF
ADDITIONAL AUTHORITY

Pursuant to RAP 10.8, Respondent Michael Holt submits the following additional authority in support of his argument in respect of the finding of adequate cause for nonparental custody: *In re Marriage of Katare*, 2012 Wash. LEXIS 575 (August 16, 2012), at ¶ 23 (“the trial court need not wait for actual harm to accrue before imposing restrictions” on a parent’s residential time).

Dated this 30th day of August 2012.

/s/ Patricia Novotny

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