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SUPREME COURT
STATE OF WASHINGTON
Feb 14, 2013, 4:07 pm
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[Handwritten Signature]

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SUPREME COURT OF THE STATE OF WASHINGTON

IN RE PERSONAL RESTRAINT)
PETITION OF) No. 87529-4
NADDER BARON HAGHIGHI.) STATEMENT OF ADDITIONAL
) AUTHORITIES
)
)
)

Pursuant to RAP 10.8, the State respectfully cites the following additional authority:

As to the issue of the inapplicability of the rules of civil procedure to a personal restraint petition: Superior Court Civil Rules 1 and 81, and Rules of Appellate Procedure 16.3(a) and (b).

As to the issue of the limits of the federal doctrine that under Federal Rule of Civil Procedure 15(c), claims that are untimely filed in a federal habeas corpus petition may relate back to claims that were timely raised, if the new claims are based on the same core

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facts and do not depend upon events that are separate in time and type from the events upon which the original claim was made:

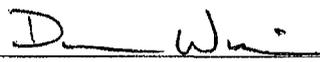
United States v. Ciampi, 419 F.3d 20, 23-25 (1st Cir. 2005),
cert. denied, 547 U.S. 1217 (2006).

United States v. Gonzalez, 592 F.3d 675, 678-80 (5th Cir.
2009), cert. denied, 131 S. Ct. 231 (2010).

Simms v. LaClair, 769 F. Supp.2d 116, 136-37 (W.D. N.Y.
2011).

Dated this 14th day of February, 2013.

DANIEL T. SATTERBERG
Prosecuting Attorney


DONNA WISE, WSBA #13224
Senior Deputy Prosecuting Attorney
Attorneys for Respondent

W554 King County Courthouse
Seattle, WA 98104
Telephone: 206-296-9000

Certificate of Service by Mail

Today I deposited in the mail of the United States of America, postage prepaid, a properly stamped and addressed envelope directed to Nancy P. Collins, the attorney for the petitioner, at Washington Appellate Project, 701 Melbourne Tower, 1511 Third Avenue, Seattle, WA 98101, and to Pamela Loginsky, attorney for amicus Washington Association of Prosecuting Attorneys, at 206 10th Avenue S.E., Olympia, WA 98501, containing a copy of the State's Statement of Additional Authorities, in PERSONAL RESTRAINT PETITION OF NADDER BARON HAGHIGHI, Cause No. 87529-4, in the Supreme Court of the State of Washington.

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

U Brame
Name
Done in Seattle, Washington

2/14/13
Date

OFFICE RECEPTIONIST, CLERK

To: Wise, Donna
Cc: 'Nancy Collins'; 'Pam Loginsky'
Subject: RE: In re Personal Restraint Petition of Nadder Baron Haghghi, No. 87529-4, Statement of Additional Authorities

Rec'd 2-14-13

Please note that any pleading filed as an attachment to e-mail will be treated as the original. Therefore, if a filing is by e-mail attachment, it is not necessary to mail to the court the original of the document.

From: Wise, Donna [<mailto:Donna.Wise@kingcounty.gov>]
Sent: Thursday, February 14, 2013 4:06 PM
To: OFFICE RECEPTIONIST, CLERK
Cc: 'Nancy Collins'; 'Pam Loginsky'
Subject: In re Personal Restraint Petition of Nadder Baron Haghghi, No. 87529-4, Statement of Additional Authorities

Good afternoon:

Please accept for filing the attached document (Statement of Additional Authorities) in

In re Personal Restraint Petition of Nadder Baron Haghghi, No. 87529-4

The certificate of service is attached to the document.
Oral argument on this case is set for February 19, 2013, at 1:30 p.m.

Thank you.

Donna Wise
Senior Deputy Prosecuting Attorney
WSBA #13224
King County Prosecutor's Office
W554 King County Courthouse
Seattle, WA 98104
206-296-9674
E-mail: Donna.Wise@kingcounty.gov

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