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STATE OF WASHINGTON
Mar 25, 2013, 10:20 am
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SUPREME COURT
OF THE STATE OF WASHINGTON

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CAROLA WASHBURN and JANET
LOH, individually, and on behalf of the
ESTATE OF BAERBEL K.
ROZNOWSKI, a deceased person,

NO. 87906-1

STATEMENT OF
ADDITIONAL AUTHORITY

Respondents,

v.

CITY OF FEDERAL WAY, a
Washington municipal corporation,

Petitioner.

COME NOW the respondents and submit the following additional
authority to the Court pursuant to RAP 10.8:

- *Clark County v. W. Wash. Growth Mgmt. Hearings Review Bd.*, ___ Wn.2d ___, ___ P.3d ___, 2012 WL 1163889 (2012) (scope of appeal is determined by the notice of appeal, the assignments of error, and the substantive arguments of the parties; appellate court errs if it adjudicates claims resolved below and not raised on appeal).

DATED this 25th day of March, 2013.

Respectfully submitted,

Philip A. Talmadge

Philip A. Talmadge, WSBA # 6973
Talmadge/Fitzpatrick
18010 Southcenter Parkway
Tukwila, WA 98188
(206) 574-6661

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Connelly Law Offices
2301 N. 30th Street
Tacoma, WA 98403
(253) 593-5100
Attorneys for Respondents Carola Washburn
and Janet Loh, individually, and on behalf of
the Estate of Baerbel K. Roznowski, a
deceased person

DECLARATION OF SERVICE

On said day stated below, I emailed a courtesy copy and deposited into the U.S. Mail for service a true and accurate copy of the Statement of Additional Authority in Supreme Court Cause No. 87906-1 to the following parties:

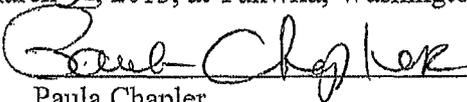
Robert L. Christie Thomas P. Miller Christie Law Group, PLLC 2100 Westlake Ave. N., Suite 206 Seattle, WA 98109	John R. Connelly, Jr. Nathan P. Roberts Connelly Law Offices 2301 N. 30 th Street Tacoma, WA 98403
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Original efiled with:

Washington Supreme Court
Clerk's Office
415 12th Street West
Olympia, WA 98504-0929

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

DATED: March 25 2013, at Tukwila, Washington.



Paula Chapler
Talmadge/Fitzpatrick

OFFICE RECEPTIONIST, CLERK

To: Paula Chapler
Subject: RE: Washburn v. City of Federal Way--Cause No. 87906-1

Rec'd 3-25-13

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: Paula Chapler [<mailto:paula@tal-fitzlaw.com>]
Sent: Monday, March 25, 2013 10:18 AM
To: OFFICE RECEPTIONIST, CLERK
Subject: Washburn v. City of Federal Way--Cause No. 87906-1

Per Mr. Talmadge's request, attached is the Statement of Additional Authority for filing in the following case:

Case Name: Carola Washburn, et al. v. City of Federal Way
Cause No. 87906-1
Attorney: Philip A. Talmadge, WSBA #6973
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Sincerely,

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