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IN THE SUPREME COURT OF THE STATE OF WASHINGTON

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STATE OF WASHINGTON,	)	No. 87904-4
Respondent	)	
	)	STATEMENT OF
v.	)	ADDITIONAL
	)	AUTHORITIES (RAP 10.8)
SAMUEL PIATNITSKY,	)	
Petitioner.	)	

Pursuant to RAP 10.8, petitioner Samuel Piatnitsky submits the following statement of additional authorities in response to the State's statement of additional authorities: *State v. Jorgenson*, 179 Wn.2d 145, 312 P.3d 960 (2013), stating:

Another factor supporting a different reading of the Washington Constitution is our common law history. Our constitution is patterned primarily on other state constitutions, which themselves draw from prerevolutionary common law.

*Id.* at 153 (citing *State v. Earls*, 116 Wn.2d 364, 391, 805 P.2d 211 (1991) (Utter, J., dissenting and explaining that article I, section 9 is more protective than the Fifth Amendment)).

Respectfully submitted this 10<sup>th</sup> day of April, 2014.

/s/ Lila J. Silverstein  
LILA J. SILVERSTEIN (38394)  
Attorney for Samuel Piatnitsky

Statement of Additional Authorities

Washington Appellate Project  
1511 Third Ave., Suite 701  
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The undersigned certifies under penalty of perjury under the laws of the State of Washington that on the below date, the original of the document to which this declaration is affixed/attached, was filed in the **Washington State Supreme Court** under **Case No. 87904-4**, and a true copy was mailed with first-class postage prepaid or otherwise caused to be delivered to the following attorney(s) or party/parties of record at their regular office or residence address as listed on ACORDS:

- respondent Erin becker, DPA  
[paoappellateunitmail@kingcounty.gov]  
King County Prosecutor's Office-Appellate Unit
- appellant
- Attorney for other party



MARIA ANA ARRANZA RILEY, Legal Assistant  
Washington Appellate Project

Date: April 10, 2014

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### **Statement of Additional Authorities**

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By

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