

Sep 09, 2016, 3:24 pm

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SUPREME COURT  
OF THE STATE OF WASHINGTON

WASHINGTON COUNTIES RISK POOL;  
LEXINGTON INSURANCE COMPANY;  
AMERICAN INTERNATIONAL GROUP,  
INC.; J. WILLIAM ASHBAUGH,  
individually; and ACE AMERICAN  
INSURANCE COMPANY,

Respondents,

v.

CLARK COUNTY, WASHINGTON, a  
municipal corporation; DONALD  
SLAGLE, an individual; LARRY DAVIS,  
individually, and as assignee of Clark  
County and of Donald Slagle; and ALAN  
NORTHROP, individually, and as  
assignee of Clark County and of Donald  
Slagle,

Appellants.

No. 91154-1

THIRD  
STATEMENT OF  
ADDITIONAL  
AUTHORITY

COME NOW appellants Larry Davis and Allan Northrop and  
submit the following additional authority to the Court pursuant to RAP 10.8:

- *Wash. Counties Risk Pool v. Corter*, 192 Wn. App. 1077, 2016 WL 1019043 (March 15, 2016) at \*1 (WCRP provides "liability insurance to member counties" as well as "county's past and present employees"); at \*2 (WCRP has duty to defend and may do so under a reservation of rights).

Third Statement of Additional  
Authority - 1

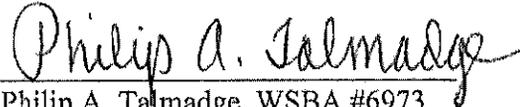
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ORIGINAL

DATED this 9th day of September, 2016.

Respectfully submitted,



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DECLARATION OF SERVICE

On said day below I electronically served a true and accurate copy of the Third Statement of Additional Authority in Supreme Court Cause No. 91154-1 to the following parties:

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Original E-filed with:  
Washington Supreme Court  
Clerk's Office

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: September 9, 2016, at Seattle, Washington.

  
Stephanie Nix-Leighton, Legal Assistant  
Talmadge/Fitzpatrick/Tribe

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**Subject:** RE: Washington Counties Risk Pool, et al v. Clark County, et al. Supreme Court Case No. 91154-1

Rec'd 9/9/16

Supreme Court Clerk's Office

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**Sent:** Friday, September 09, 2016 3:06 PM

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**Subject:** Washington Counties Risk Pool, et al v. Clark County, et al. Supreme Court Case No. 91154-1

To the Clerk of the Supreme Court,

Attached for filing please find:

Case Name: *Washington Counties Risk Pool, et al v. Clark County, et al.*

Cause No. 91154-1

Pleading: Third Statement of Additional Authority

On Behalf of: Appellants Davis and Northrop

Filer: Philip Talmadge, WSBA #6973  
Email: [phil@tal-fitzlaw.com](mailto:phil@tal-fitzlaw.com)

Thank you.

*Stephanie Nix-Leighton*

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