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NO. 91567-9

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IN THE SUPREME COURT OF THE STATE OF WASHINGTON

CHRISTOPHER PIRIS,

Appellant,

vs.

ALFRED KITCHING and JANE
DOE KITCHING, husband and wife
and their marital community,
SOCIETY OF COUNSEL
REPRESENTING ACCUSED
PERSONS (SCRAP), ERIC
NIELSEN and JANE DOE
NIELSEN, husband and wife and
their marital community, NIELSEN
BROMAN & KOCH PLLC,

Respondents.

FIRST STATEMENT OF
ADDITIONAL AUTHORITIES
BY RESPONDENTS ALFRED
KITCHING AND SCRAP

Pursuant to Rule of Appellate Procedure 10.8, Respondents Alfred Kitching and Society of Counsel Representing Accused Persons offer the following additional authorities regarding end of the attorney-client relationship potentially relevant to the issue of application of any exception to the innocence rule to Mr. Piris's allegations:

1. *Belli v. Shaw*, 98 Wn.2d 569, 577, 657 P.2d 315 (1983). ("Ordinarily, no special formality is required to discharge an attorney and any act of the client indicating an unmistakable purpose to sever relations is sufficient. [Citation deleted.] Employment of other counsel, which is

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inconsistent with the continuance of the former relationship, shows an unmistakable purpose to sever the former relationship. [Citation deleted.] The undisputed evidence shows, therefore, as a matter of law, that Church's contract with plaintiff was repudiated by 1971.” ”)

2. *Lockhart v. Greive*, 66 Wn. App. 735, 741, 834 P.2d 64 (1992) (prior attorney's relationship with client ends when new counsel is retained).

Respectfully submitted on this 26th day of January, 2016.

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Representing Accused Persons

CERTIFICATE OF FILING AND SERVICE

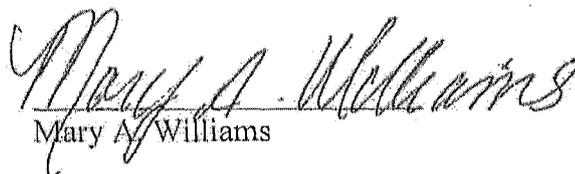
The undersigned declares under penalty of perjury, under the laws of the State of Washington, that the following is true and correct: That on the 21st day of January, 2016, I arranged for service via *U.S. Mail (together with a copy via e-mail)* of the foregoing FIRST STATEMENT OF ADDITIONAL AUTHORITIES BY RESPONDENTS AL KITCHING AND SOCIETY OF COUNSEL REPRESENTING ACCUSED PERSONS on the parties to this action as follows:

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Subject: RE: Piris v. Kitching, et al./No. 91567-9: Filing of First Statement of Additional Authorities by Respondents Alfred Kitching and SCRAP

Received 1-26-16

Supreme Court Clerk's Office

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Cc: johnrothschild.wa@gmail.com; 'suzanne-elliott@msn.com' <suzanne-elliott@msn.com>; david.hackett@kingcounty.gov; 'rjm@leesmart.com' <rjm@leesmart.com>; Rothrock, Averil <ARothrock@SCHWABE.com>; Krashan, Allison K. <AKrashan@schwabe.com>; Howard, Christopher H. <CHoward@SCHWABE.com>
Subject: Piris v. Kitching, et al./No. 91567-9: Filing of First Statement of Additional Authorities by Respondents Alfred Kitching and SCRAP

Dear Clerk:

Attached please find First Statement of Additional Authorities by Respondents Alfred Kitching and SCRAP to be filed with the Court.

Thank you,

Mary

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