

January 15, 2016

Ronald R. Carpenter  
Supreme Court Clerk  
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P.O. Box 40929  
Olympia, WA 98504-0929

RECEIVED  
SUPREME COURT  
STATE OF WASHINGTON  
Jan 15, 2016, 11:56 am  
BY RONALD R. CARPENTER  
CLERK

RECEIVED BY E-MAIL

Re: *Fred Binschus, et al. v. Skagit County*  
(Supreme Court Cause No. 91644-6)

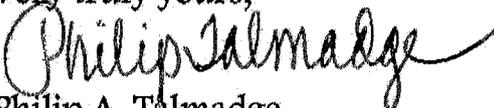
Dear Mr. Carpenter:

In the course of oral argument on Thursday January 14, 2016 in the above referenced case, I mentioned to the Court that I would provide specific record citations for Isaac Zamora's voluntary ingestion of medications. Those citations are: CP 2443 (County medication log indicating there were times when Zamora voluntarily took Lamictal and times when he refused it); CP 2543-45 (Dr. Hegyvary's opinion that Zamora would have voluntarily accepted treatment and noting his successful course of treatment at Western State Hospital).

Finally, I made reference in my argument to an important factual point not noted in the briefs – Zamora threatened his girlfriend with a knife and was subject to a no-contact order (CP 1968, 1970).

Thank you in advance for providing this information to the Court.

Very truly yours,

  
Philip A. Talmadge

cc: Nathan Roberts  
John Connelly  
Jamie D. Allen  
Eugene R. Moses

Filed   
Washington State Supreme Court

JAN 19 2016 

Ronald R. Carpenter  
Clerk



ORIGINAL

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DECLARATION OF SERVICE

On said day below I emailed a copy for service a true and accurate copy of the Letter to Clerk Carpenter in Supreme Court Cause No. 91644-6 to the following:

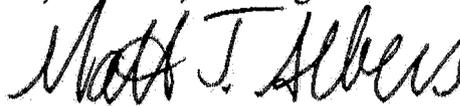
Nathan Roberts John Connelly Connelly Law Offices, PLLC 2301 North 30th Street Tacoma, WA 98403	Jaime D. Allen Davis Wright Tremaine 1201 Third Avenue, Suite 2200 Seattle, WA 98101-3045
Eugene R. Moses Law Offices of Gene R. Moses 2200 Rimland Dr. Suite 115 Bellingham, WA 98226-6643	John E. Justice Law, Lyman, Daniel, Kamerrer & Bogdanovich PO Box 11880 Olympia, WA 98508-1880
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Arne O. Denny Skagit County Prosecutor's Office 605 S. Third Mount Vernon, WA 98273	Jeffrey D. Dunbar Ogden Murphy Wallace PLLC 901 5 <sup>th</sup> Avenue, Suite 3500 Seattle, WA 98164-2008
Copy sent by U.S. Mail & Email Howard M. Goodfriend Catherine Smith Smith Goodfriend, P.S. 1619 8th Avenue North Seattle, WA 98109	Michael Lynch Senior Counsel Office of the Attorney General PO Box 40126 Olympia, WA 98504-0126
Daniel B. Heid Auburn City Attorney 25 West Main Street Auburn, WA 98001	Rebecca Boatright Seattle City Attorneys Office 701 5 <sup>th</sup> Avenue, Suite 2050 Seattle, WA 98104-7097

Shannon M. Ragonesi Keating, Bucklin & McCormack, Inc., P.S. 800 5 <sup>th</sup> Avenue, Suite 4141 Seattle, WA 98104-3175	Bryan Harnetiaux Attorney at Law 517 E. 17 <sup>th</sup> Avenue Spokane, WA 99203-2210
George Ahrend Ahrend Law Firm PLLC 100 E. Broadway Avenue Moses Lake, WA 98837	Matthew Segal Pacifica Law Group LLP 1191 2 <sup>nd</sup> Avenue, Suite 2000 Seattle, WA 98101-3404

Original E-filed with:  
Washington Supreme Court  
Clerk's Office  
415 12<sup>th</sup> Street W  
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: January 15, 2016, at Seattle, Washington.



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Matt J. Albers, Paralegal  
Talmadge/Fitzpatrick/Tribe

## OFFICE RECEPTIONIST, CLERK

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**To:** Matt Albers  
**Cc:** Nathan Roberts; vshirer@connelly-law.com; Jack Connelly (jconnelly@connelly-law.com); jdunbar@omwlaw.com; jaimeallen@dwt.com; keithmorton@dwt.com; gene@genemoses.net; wmc@cnrlaw.com; Sue Egbert; dbrett@brettlaw.com; amchugh@brettlaw.com; mikel@atg.wa.gov; ckerley@ecl-law.com; arned@co.skagit.wa.us; jjustice@lldkb.com; marry@lldkb.com; howard@washingtonappeals.com; cate@washingtonappeals.com; Victoria Vigoren; dheid@auburnwa.gov; rebecca.boatright@seattle.gov; sragonesi@kbmlawyers.com; bryanpharnetiauxwsba@gmail.com; gahrend@ahrendlaw.com; matthew.segal@pacificallawgroup.com; Talner@aclu-wa.org; mcooke@aclu-wa.org  
**Subject:** RE: Fred Binschus, et al. v. Skagit County and State of Washington, Dept. of Corrections, et al. - Supreme Ct 91644-6

Received on 01-15-2016

Supreme Court Clerk's Office

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.

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**From:** Matt Albers [mailto:Matt@tal-fitzlaw.com]  
**Sent:** Friday, January 15, 2016 11:55 AM  
**To:** OFFICE RECEPTIONIST, CLERK <SUPREME@COURTS.WA.GOV>  
**Cc:** Nathan Roberts <nroberts@connelly-law.com>; vshirer@connelly-law.com; Jack Connelly (jconnelly@connelly-law.com) <jconnelly@connelly-law.com>; jdunbar@omwlaw.com; jaimeallen@dwt.com; keithmorton@dwt.com; gene@genemoses.net; wmc@cnrlaw.com; Sue Egbert <sue@cnrlaw.com>; dbrett@brettlaw.com; amchugh@brettlaw.com; mikel@atg.wa.gov; ckerley@ecl-law.com; arned@co.skagit.wa.us; jjustice@lldkb.com; marry@lldkb.com; howard@washingtonappeals.com; cate@washingtonappeals.com; Victoria Vigoren <victoria@washingtonappeals.com>; dheid@auburnwa.gov; rebecca.boatright@seattle.gov; sragonesi@kbmlawyers.com; bryanpharnetiauxwsba@gmail.com; gahrend@ahrendlaw.com; matthew.segal@pacificallawgroup.com; Talner@aclu-wa.org; mcooke@aclu-wa.org  
**Subject:** Fred Binschus, et al. v. Skagit County and State of Washington, Dept. of Corrections, et al. - Supreme Ct 91644-6

Good afternoon,

Attached please find the following document for filing with the Court:

Document to be filed: Letter to Clerk Carpenter, dated January 15, 2016

Case Name: Fred Binschus, et al. v. Skagit County and State of Washington, Dept. of Corrections, et al.

Case Cause Number: 91644-6

Attorney Name and WSBA#: Philip A. Talmadge, WSBA #6973 of Talmadge/Fitzpatrick/Tribe

Contact information: Matt J. Albers, (206) 574-6661, [matt@tal-fitzlaw.com](mailto:matt@tal-fitzlaw.com)

If you have any questions, please feel free to contact me. Thank you!

Matt J. Albers, Paralegal

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