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NO. 91846-5

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WASHINGTON STATE SUPREME COURT

HEIDI KROEBER a/k/a HEIDI LAZENBY

v.

GEICO INSURANCE COMPANY

Fourth Statement of Additional Authorities

LAW OFFICES OF RICHARD MCKINNEY

By: Richard McKinney, WSBA No. 4895
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Seattle, WA 98116
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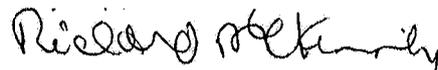
1. *Farrer v. U.S.F & G*, 805 So. 2d 85, 91-92 (Fla. Dist. Ct. App. 2002) (“violence against motorists is a common occurrence and one which is in contemplation of parties”)

2. *Lindstrom v. Hanover Ins. Co.*, 138 N.J. 242, 252-53, 649 A.2d 1272 (1994) (corrects erroneous citation of lower court decision for this case on p. 10 of Kroeber’s initial brief to Supreme Court) (In addition to proposition set forth for this case on p. 10 of Kroeber’s initial brief, case states that drive-by shootings are a sufficiently common part of American experience as to be foreseeable)

3. *Willard v. Kelley*, 1990 OK 127, 803 P.2d 1124 (1990) holds that there is a jury question whether the cause of use of the vehicle in a drive-by shooting was the same as the cause of the shooting.

DATED this 5th day of October, 2015.

Respectfully



RICHARD MCKINNEY, WSBA NO. 4895
Attorney for Heidi Kroeber

CERTIFICATE OF SERVICE

I hereby certify that on October 5, 2015, one (1) copy of the **Statement of Additional Authorities** was mailed via Regular Mail to the following individual:

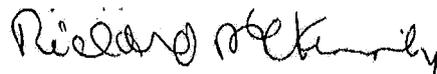
Alfred E. Donohue, WSBA #32774
Wilson Smith Cochran Dickerson
901 Fifth Avenue, Suite 1700
Seattle, WA 98164

I hereby certify that on October 5, 2015, one (1) copy of the **Statement of Additional Authorities** was emailed to the following:

EMAIL – supreme@courts.wa.gov
Washington Supreme Court
P.O. Box 40929
Olympia, WA 98504-0929

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

EXECUTED at Bremerton, Washington this 5th day of October, 2015.



RICHARD McKINNEY, WSBA NO. 4895
Attorney for Heidi Kroeber

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Attached find Heidi Kroeber's Fourth Supplemental Authorities.

Richard McKinney