

SUPREME COURT OF THE STATE OF WASHINGTON

IN RE THE DETENTION OF)
)
MARK BLACK,) No. 92332-9
)
Respondent.) STATEMENT OF ADDITIONAL
) AUTHORITY
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)
)
)
)

Pursuant to RAP 10.8, The State respectfully cites the following as additional authority:

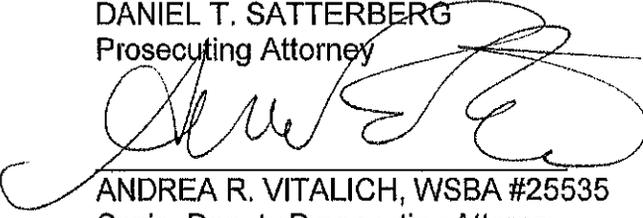
In re the Detention of M.W., ___ Wn.2d ___ (No. 90570-3, filed 6/9/16), stating that a procedural due process challenge to recent amendments to the Involuntary Treatment Act (ITA) should be analyzed in light of "the entire process" of civil commitment when "viewed together as a whole," rather than focusing on one narrow aspect of the proceedings. Slip Op. at 23-24. The Court also held that under the Mathews v. Eldridge¹ test for procedural due process, the third factor weighs in favor of the State because the State "has important interests in increasing public safety, encouraging effective treatment of violent mentally ill

¹ 424 U.S. 319, 96 S. Ct. 893, 47 L. Ed.2d 14 (1976).

individuals, and avoiding the expense of unnecessary evidentiary hearings." Slip op. at 25.

Dated this 20th day of June, 2016.

DANIEL T. SATTERBERG
Prosecuting Attorney

A handwritten signature in black ink, appearing to read 'Andrea R. Vitalich', written over a horizontal line.

ANDREA R. VITALICH, WSBA #25535
Senior Deputy Prosecuting Attorney
Attorneys for Respondent
Office ID #91002

Certificate of Service by Electronic Mail

Today I directed electronic mail addressed to Nancy Collins, the attorney for the respondent, at Nancy@washapp.org, containing a copy of the STATEMENT OF ADDITIONAL AUTHORITY, in In Re Detention of Mark Antonio Black, Cause No. 92332-9, in the Supreme Court, for the State of Washington.

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

Dated this 28th day of June, 2016.

A handwritten signature in black ink, appearing to be "Nancy Collins", written over a horizontal line.

Name:
Done in Seattle, Washington

KING COUNTY PROSECUTOR'S OFFICE - APPELLATE UNIT

June 28, 2016 - 3:23 PM

Confirmation of Filing

Filed with Court: Supreme Court
Appellate Court Case Number: 92332-9
Appellate Court Case Title: In re the Detention of: Mark Black

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