

SUPREME COURT
OF THE STATE OF WASHINGTON

BASILIO CORNELIO CARRERA,
an unmarried individual; DEPARTMENT
OF LABOR & INDUSTRIES, as statutory
assignee of Basilio Cornelio Carrera,

Respondents,

v.

SUNHEAVEN FARMS, a Washington
general partnership;
SUNHEAVEN FARMS, LLC, a
Washington limited liability company;
BRENT SCHULTHIES FARMS, LLC, a
Washington limited liability company;
BRENT SCHULTHIES and ELAINE
SCHULTHIES, husband and wife, and the
marital community comprised thereof,
individually and as general partner of
Sunheaven Farms; and JOHN DOES and
JANE DOES 1 through 10 inclusive,

Petitioners,

and

THOMAS S. OLMSTEAD and BARBRA
E. OLMSTEAD, husband and wife, and the
marital community comprised thereof;
LAW OFFICE OF THOMAS S.
OLMSTEAD, a Washington sole
proprietorship; JOHN DOES and JANE
DOES 1 through 10 inclusive,

Defendants.

No. 93799-1

STATEMENT OF
ADDITIONAL
AUTHORITIES

COME NOW the petitioners and submit the following additional authorities to the Court pursuant to RAP 10.8:

- *Eugster v. Wash. St. Bar Ass'n*, ___ Wn.2d ___, ___ P.3d ___, 2017 WL 1655737 at ¶ 66 (circumstances governing when a matter should have been litigated in prior action);
- *Hansen v. Kelly-Hansen*, 87 Wn. App. 320, 330, 941 P.2d 1108 (1997) (in determining if matter should have been litigated in earlier action, courts look to whether matters arise out of same facts, involve substantially the same evidence, and whether rights established in first matter are impaired or destroyed in second; matter should have been raised if it is alternate remedy or theory of recovery).

DATED this 22d day of May, 2017.

Respectfully submitted,



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Attorneys for Petitioners Sunheaven
Farms and Brent Schulthies

DECLARATION OF SERVICE

On said day below, I electronically served a true and accurate copy of the *Statement of Additional Authorities* in Supreme Court Cause No. 93799-1 to the following parties:

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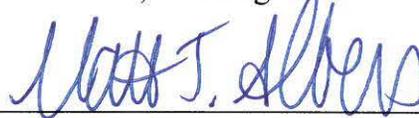
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Original e-filed with:
Washington Supreme Court
Clerk's Office

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: May 22, 2017 at Seattle, Washington



Matt J. Albers, Paralegal
Talmadge/Fitzpatrick/Tribe

TALMADGE/FITZPATRICK/TRIBE

May 22, 2017 - 12:26 PM

Transmittal Information

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Statement of Additional Authorities

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