

FILED  
SUPREME COURT  
STATE OF WASHINGTON  
4/17/2018 4:38 PM  
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IN THE SUPREME COURT OF THE STATE OF WASHINGTON

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STATE OF WASHINGTON,	)	
	)	
Respondent,	)	No. 94346-0
	)	
v.	)	STATEMENT OF
	)	ADDITIONAL
MICHAEL MURRAY,	)	AUTHORITIES
	)	
Petitioner.	)	

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Under RAP 10.8, Mr. Murray submits the following additional authority for this Court's consideration on the issues of whether the void for vagueness doctrine applies to statutory aggravating factors and whether the so-called "rapid recidivism" aggravator is unconstitutionally vague in violation of due process:

Sessions v. Dimaya, No. 15-1498, slip op., 2018 WL 1800371 (U.S. Apr. 17, 2018) (holding that residual clause in The Immigration and Nationality Act defining "crime of violence" is impermissibly vague in violation of due process).

DATED this 17th Day of April, 2018.

Respectfully submitted,



Richard W. Lechich – WSBA #43296  
Washington Appellate Project  
Attorney for Petitioner

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,

Respondent,

v.

MICHAEL MURRAY,

Petitioner.

NO. 94356-0

DECLARATION OF DOCUMENT FILING AND SERVICE

I, MARIA ARRANZA RILEY, STATE THAT ON THE 17<sup>TH</sup> DAY OF APRIL, 2018, I CAUSED THE ORIGINAL **STATEMENT OF ADDITIONAL AUTHORITY** TO BE FILED IN THE WASHINGTON STATE SUPREME COURT AND A TRUE COPY OF THE SAME TO BE SERVED ON THE FOLLOWING IN THE MANNER INDICATED BELOW:

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<input checked="" type="checkbox"/> NANCY TALNER	(X)	U.S. MAIL
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SIGNED IN SEATTLE, WASHINGTON THIS 17<sup>TH</sup> DAY OF APRIL, 2018.



X \_\_\_\_\_

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# WASHINGTON APPELLATE PROJECT

April 17, 2018 - 4:38 PM

## Transmittal Information

**Filed with Court:** Supreme Court  
**Appellate Court Case Number:** 94346-0  
**Appellate Court Case Title:** State of Washington v. Michael Murray  
**Superior Court Case Number:** 15-1-02005-2

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