

FILED
SUPREME COURT
STATE OF WASHINGTON
11/2/2018 10:21 AM
BY SUSAN L. CARLSON
CLERK

SUPREME COURT
OF THE STATE OF WASHINGTON

CHAN HEALTHCARE GROUP, PS,

Petitioner,

vs.

LIBERTY MUTUAL FIRE INSURANCE
COMPANY, and LIBERTY MUTUAL
INSURANCE COMPANY, a foreign
corporation doing business in Washington,

Respondents.

No. 95416-0

STATEMENT OF
ADDITIONAL
AUTHORITIES

COME NOW respondents (collectively “Liberty Mutual”) who submit the following additional authorities to the Court pursuant to RAP 10.8:

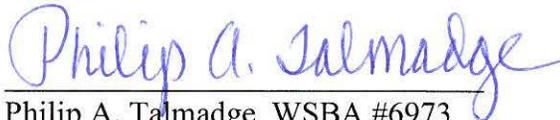
- *China Agritech, Inc. v. Resh*, 584 U.S. ___, 138 S. Ct. 1800, 201 L. Ed. 2d 123 (2018) (in addressing the timeliness of filing class actions, U.S. Supreme Court makes clear that determination of class should be made early in litigation and successive class filings are barred);
- *Underwriters Nat’l Assur. Co. v. N. Carolina Life and Accident and Health Ins. Guaranty Ass’n*, 455 U.S. 691, 102 S. Ct. 1357, 71 L. Ed. 2d 558 (1982) (party cannot escape full faith and credit or *res judicata* by asserting its own failure to raise matters clearly within scope of prior proceeding);
- *Simmermon v. Dryvit Systems, Inc.*, 953 A.2d 478, 487 n.9 (N.J. 2008) (rejects broad collateral review of sister state judgments undertaken by Vermont court in *Homeside Lending*, noting “We are not certain whether the ‘broad collateral review’ approach is truly faithful to the full faith and credit doctrine.”).

Statement of
Additional Authorities - 1

Talmadge/Fitzpatrick/Tribe
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DATED this 20 day of November, 2018.

Respectfully submitted,



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Attorneys for Respondents Liberty
Mutual Fire Insurance Company and
Liberty Mutual Insurance Company

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. 95416-0 to the following:

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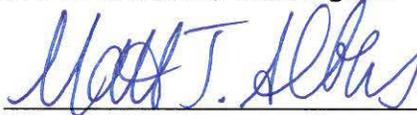
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Original E-filed with:
Supreme Court
Clerk's Office

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: November 2, 2018 at Seattle, Washington.



Matt J. Albers, Paralegal
Talmadge/Fitzpatrick/Tribe

TALMADGE/FITZPATRICK/TRIBE

November 02, 2018 - 10:21 AM

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: 95416-0
Appellate Court Case Title: Chan Healthcare Group v. Liberty Mutual Fire Insurance Co., et al.
Superior Court Case Number: 15-2-21662-7

The following documents have been uploaded:

- 954160_Briefs_20181102101907SC108069_0350.pdf
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