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7 IN THE SUPREME COURT OF THE STATE OF WASHINGTON

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9 STATE OF WASHINGTON,
10 Respondent,
11 v.
12 JOSHUA CANE FRAHM ,
13 Appellant.

No. 95947-1
Clark County No. 14-1-02522-0
STATEMENT OF ADDITIONAL
AUTHORITIES

14 Pursuant to RAP 10.8, the Respondent, State of Washington, represented by the
15 Prosecuting Attorney for Clark County, by and through his Deputy, Kelly M. Ryan, hereby
16 supplements the record with this Statement of Additional Authorities:
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19 *State v. Leech*, 114 Wn.2d 700, 790 P.2d 160 (1990)

20 (Holding that an arsonist was liable for the death of a firefighter when the arsonist set fire
21 to a building and the firefighter arrived on the scene before the fire was extinguished, because
22 the death occurred in furtherance of the arson, even though the arsonist's initial act of setting the
23 fire had been completed, he left the scene, did not ever see the firefighter, and the firefighter had
24 been negligent by letting his oxygen tank run out.)

25 *State v. Harris*, 199 Wn.App. 137, 398 P.3d 1229 (2017)

26 (Finding that the defendant was the proximate cause of the death of a gunshot victim who
27 died of pneumonia fifteen months after being shot and after having multiple surgeries and
hospital visits and that the causal chain was not broken by any of the multiple intervening events,
STATEMENT OF ADDITIONAL AUTHORITIES- 1

CLARK COUNTY PROSECUTING ATTORNEY
1013 FRANKLIN STREET • PO BOX 5000
VANCOUVER, WASHINGTON 98666-5000
(564) 397-2261 (OFFICE)
(564) 397-2230 (FAX)

1 including an improved physical condition, as the initial shooting was a felonious act capable of
2 causing harm and that sufficient evidence supported the jury finding of a direct causal connection
3 between the shooting and the death.)

4 Respectfully submitted this 22 day of February 2019.

5 Respectfully Submitted,

6 ANTHONY F. GOLIK
7 Prosecuting Attorney
8 Clark County, Washington

9 By: 
10 _____
11 KELLY M. RYAN WSBA #50215
12 Deputy Prosecuting Attorney
13 OID No. 91127
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CLARK COUNTY PROSECUTING ATTORNEY

February 22, 2019 - 2:27 PM

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: 95947-1
Appellate Court Case Title: State of Washington v. Joshua Cane Frahm
Superior Court Case Number: 14-1-02522-0

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Vancouver, WA, 98666-5000
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