

FILED
SUPREME COURT
STATE OF WASHINGTON
11/5/2018 3:03 PM
BY SUSAN L. CARLSON
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IN THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,)	No. 96344-4
Petitioner,)	
)	STATEMENT OF
v.)	ADDITIONAL
)	AUTHORITIES
KARL PIERCE,)	(RAP 10.8)
Respondent.)	
_____)	

Pursuant to RAP 10.8, appellant submits the following statement of additional authorities in support of the argument that the Court should grant review because the denial of Karl Pierce’s challenge to the peremptory strike of an African-American juror violated his constitutional equal protection rights, which is addressed at pages 23-24 of his Answer to the State’s Petition for Review: *State v. Jefferson*, No. 94853-4, Slip Op. 2, 28-32 (Nov. 1, 2018) (modifying the third step of the *Batson* test such that if “an objective observer could view race or ethnicity as a factor in the use of the peremptory challenge . . . the peremptory strike shall be denied” and reversing and remanding for a new trial because, on de novo review, “an objective observer could

view race as a factor in the peremptory strike” of an African-American juror).

Respectfully submitted this 5th day of November, 2018.



Marla L. Zink, WSBA 39042
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STATE OF WASHINGTON,)	
Petitioner,)	No. 96344-4
)	
v.)	
)	
KARL PIERCE,)	CERTIFICATE OF SERVICE
Respondent.)	

I, Marla Zink, state that on the below indicated date, I caused to be filed in the Supreme Court of the State of Washington the attached Statement of Additional Authorities dated November 5, 2018 and a true and correct copy of the same to be served on the following in the manner indicated below:

Prosecuting Atty King County	paoappellateunitmail@kingcounty.gov
Marla Leslie Zink	marla@marlazink.com
Ann Marie Summers	ann.summers@kingcounty.gov

SIGNED and DATED this 5th day of November, 2018 in Seattle, WA:

s/ Marla L. Zink
Marla L. Zink, WSBA 39042
The Law Office of Marla Zink, PLLC
1037 NE 65th St #80840
Seattle, WA 98115
(360) 726-3130
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THE LAW OFFICE OF MARLA ZINK, PLLC

November 05, 2018 - 3:03 PM

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: 96344-4
Appellate Court Case Title: State of Washington v. Karl Emerson Pierce, et al.
Superior Court Case Number: 12-1-04437-2

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THE LAW OFFICE OF MARLA ZINK, PLLC

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