

NO. 96830-6

SUPREME COURT OF THE STATE OF WASHINGTON

JESSICA L. WRIGLEY, et al,

Respondents,

v.

STATE OF WASHINGTON,
DEPARTMENT OF SOCIAL AND
HEALTH SERVICES, et al,

Petitioners.

PETITIONER,
STATE OF WASHINGTON,
DEPARTMENT OF SOCIAL
AND HEALTH SERVICES'
STATEMENT OF
ADDITIONAL AUTHORITES

Pursuant to RAP 10.8, State of Washington, Department of Social and Health Services, et al., Petitioners, submit the following additional authorities in response to a question posed by Justice Stephens to opposing counsel during oral argument. Justice Stephens asked:

Can you, re-clarify for me on facts, was there a present protection order in place at the time this placement decision with the father was being considered or was it, had it been a past protection order?^[1]

To that question, the State provides the following answer:

There was not a present protection order in place when the father, Anthony Viles, petitioned for custody of A.A. in 2011 and the dependency court made its placement decision in

¹ Oral Argument at 25:37, *Wrigley v. State*, (No. 96830-6), available at <https://www.tvw.org/watch/?eventID=2019101015> (last visited October 14, 2019).

January 2012. The protection order between Jessica Wrigley and Mr. Viles was dismissed at Ms. Wrigley's request in December 2005.

CP 889-91.

RESPECTFULLY SUBMITTED this 24th day of October, 2019.

ROBERT W. FERGUSON
Attorney General

/s/ Allison Croft
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DECLARATION OF SERVICE

I declare under penalty of perjury in accordance with the laws of the state of Washington that on October 24, 2019, the preceding document was filed in the Washington State Supreme Court according to the Court's protocols for electronic filing at the following address:
Supreme@courts.wa.gov

A copy of the preceding document was also served on Respondents by email according to the Court's protocols for electronic filing at the following e-mail addresses:

Gary Preble: gary@preblelaw.com

DATED this 24th day of October 2019, at Tumwater, Washington.

/s/ Jeanette Fagerness

Jeanette Fagerness, Legal Assistant

ATTORNEY GENERAL'S OFFICE, TORTS DIVISION

October 24, 2019 - 3:05 PM

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