

FILED  
SUPREME COURT  
STATE OF WASHINGTON  
9/10/2019 12:05 PM  
BY SUSAN L. CARLSON  
CLERK

NO. 97195-1

SUPREME COURT OF THE STATE OF WASHINGTON

TAYLOR BLACK, et al.,

Appellants,

v.

CENTRAL PUGET SOUND  
REGIONAL TRANSIT  
AUTHORITY and STATE OF  
WASHINGTON,

Respondents.

NOTICE

It has come to our attention in the last 24 hours that the State's Response Brief and Answer to Amicus Briefs contain an inaccurate factual statement. In writing those briefs, our understanding was that the valuation schedule currently used by the Department of Licensing was the "depreciation schedule that existed on January 1, 1996." Br. of Resp't State of Wash. at 2. We have just learned that the valuation schedule the Department has applied for some time is that contained in Referendum 49, Chapter 321, Laws of 1998. We write to notify the Court immediately of this error. The State will not be presenting at oral argument, which will be handled by Respondent Sound Transit, and the State takes no immediate position on the implications of this issue. The State welcomes the opportunity to file supplemental briefing on this issue.

RESPECTFULLY SUBMITTED this 10th day of September, 2019.

ROBERT W. FERGUSON

Attorney General

A handwritten signature in black ink, appearing to read "D. P. Huddleston". The signature is written in a cursive style with a large initial "D" and a stylized "P".

DIONNE PADILLA-HUDDLESTON

WSBA No. 38356

*Assistant Attorney General*

JEFFREY T. EVEN

WSBA No. 20367

*Deputy Solicitor General*

Attorneys for State of Washington

## PROOF OF SERVICE

I, Jennifer K. Bancroft, hereby state and declare as follows:

1. That I am a citizen of the United States of America, a resident of the State of Washington, over the age of eighteen (18) years, and not a party to the above-entitled action.

2. That on the 10th day of September 2019, I caused to be served a true and correct copy of **Notice**, as follows:

Email as per the stipulation for electronic service

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SUSAN CARLSON, CLERK  
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I DECLARE UNDER PENALTY OF PERJURY UNDER THE  
LAWS OF THE STATE OF WASHINGTON that the foregoing is true and  
correct.

DATED this 10th day of September 2019, in Seattle, Washington.

  
\_\_\_\_\_  
JENNIFER K. BANCROFT, Legal Assistant

# AGO/LICENSING AND ADMINISTRATIVE LAW DIV

September 10, 2019 - 12:05 PM

## Transmittal Information

**Filed with Court:** Supreme Court  
**Appellate Court Case Number:** 97195-1  
**Appellate Court Case Title:** Taylor Black, et al. v. Central Puget Sound Regional Transit Authority, et al.  
**Superior Court Case Number:** 18-2-08733-9

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### Comments:

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