

IN THE SUPREME COURT OF THE STATE OF
WASHINGTON

In re Detention of)	No. 104064-4
)	
SHAWN SKELTON,)	PETITIONER’S STATEMENT
)	OF ADDITIONAL
Petitioner.)	AUTHORITIES (RAP 10.8)

Shawn Skelton submits *John Doe P v. Thurston County*, No. 102976-4 (Wash. June 12, 2025) to support review of the Court of Appeals’ sua sponte redaction of a witness’s name without justification or analysis under GR 15 and *Seattle Times Co. v. Ishikawa*, 97 Wn.2d 30, 640 P.2d 716 (1982). Pet. for Review, 3-4, 29-32.

Article I, section 10 protects the open administration of justice. *John Doe P*, Slip op. at 10 (citing *John Doe G v. Dep’t of Corrs.*, 190 Wn.2d 185, 201, 410 P.3d 1156 (2018)). It prohibits court closure, sealing, or redaction of documents, and requires the use of “actual names” in proceedings and court records. *Id.* at 3. This protection is so strong that this Court

held article I, section 10 prohibits the use of pseudonyms even at the postdismissal stage of a case unless GR 15 and *Ishikawa* factors justify sealing. *Id.* at 12-19.

In *John Doe P*, this Court reversed rulings permitting the use of pseudonyms. It rejected the reasoning “article I, section 10 is ‘not triggered’ by pseudonymous litigation” and confirmed courts must conduct *Ishikawa* and GR 15 analyses before permitting parties to proceed as John Does. *Id.* at 4. *John Doe P* reiterated this Court’s holding in *John Doe G* “‘that names in pleadings are subject to article I, section 10’ and that an order to proceed in pseudonym ‘must meet the *Ishikawa* factors,’ as well as GR 15.” *Id.* at 6 (quoting *John Doe G*, 190 Wn.2d 185, 201, 410 P.3d 1156 (2018)).

Similar to the position this Court rejected in *John P*, here, the State argues using initials is not a court closure. Answer, 26-29. That is incorrect. The use of other than “actual names” is a sealing. Slip op. at 11.

“The open administration of justice presumptively includes public access to the actual names of litigants.” *Id.* at 10. The Court of Appeals’ sua sponte action using initials rather than “actual names,” without notice to the parties or compliance with GR 15 and *Ishikawa*, constitutes an unconstitutional sealing. *John Doe P* supports Mr. Skelton’s request for review.

Counsel certifies this document complies with RAP 18.17 and the word processing software calculates the number of words in this document, exclusive of words exempted by the rule, as 348 words.

DATED this 12th day of June, 2025.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'K. Huber', with a stylized flourish at the end.

KATE R. HUBER (WSBA 47540)
Washington Appellate Project (91052)
Attorneys for Appellant
katehuber@washapp.org
wapofficemail@washapp.org

WASHINGTON APPELLATE PROJECT

June 12, 2025 - 4:23 PM

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: 104,064-4
Appellate Court Case Title: In the Matter of the Detention of Shawn T. Skelton

The following documents have been uploaded:

- 1040644_Briefs_20250612162333SC278910_4586.pdf
This File Contains:
Briefs - Petitioners Additional Authorities
The Original File Name was washapp.061225-04.pdf

A copy of the uploaded files will be sent to:

- jennifer.ritchie@kingcounty.gov
- mike.mohandeson@kingcounty.gov
- nami.kim@kingcounty.gov
- paoappellateunitmail@kingcounty.gov
- paosvpstaff@kingcounty.gov

Comments:

Sender Name: MARIA RILEY - Email: maria@washapp.org

Filing on Behalf of: Kate Huber - Email: katehuber@washapp.org (Alternate Email: wapofficemail@washapp.org)

Address:
1511 3RD AVE STE 610
SEATTLE, WA, 98101
Phone: (206) 587-2711

Note: The Filing Id is 20250612162333SC278910