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Washington State Supreme Court

JAN 28 2015  
E  
Ronald R. Carpenter  
Clerk

**NO. 91203-3**

**WASHINGTON STATE**

**SUPREME COURT**

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**STATE OF WASHINGTON,**

Plaintiff,  
Respondent,

vs.

**JOSEPH L. SHOUSE,**

Defendant,  
Appellant.

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**ADDITIONAL STATEMENT OF AUTHORITIES**

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DENNIS W. MORGAN WSBA #5286  
Attorney for Appellant  
P.O. Box 1019  
Republic, WA 99166  
(509) 775-0777

COMES NOW, JOSEPH L. SHOUSE, by and through the undersigned attorney, and requests the Court to consider the following additional authorities in connection with his appeal:

*State v. Kier*, 164 Wn.2d 798, 194 P.3d 212 (2008) (reaffirming *State v. Freeman*, 153 Wn.2d 765, 108 P.3d 753 (2005) on the basis of both merger and double-jeopardy).

DATED this 26th day of January, 2015.

Respectfully submitted,

s/ Dennis W. Morgan

DENNIS W. MORGAN WSBA #5286

Attorney for Defendant/Appellant.

P.O. Box 1019

Republic, WA 99166

(509) 775-0777

(509) 775-0776

[nodblspk@rcabletv.com](mailto:nodblspk@rcabletv.com)

NO. 91203-3

WASHINGTON STATE

SUPREME COURT

STATE OF WASHINGTON, )  
 )  
 ) Plaintiff, ) KITTITAS COUNTY  
 ) Respondent, ) NO. 11 1 00220 8  
 )  
 ) **CERTIFICATE OF SERVICE**  
 )  
 JOSEPH L. SHOUSE, )  
 ) COURT OF APPEALS NO. 30640-2-III  
 ) Defendant, ) (Consolidated with 30641-1-III)  
 ) Appellant. )  
 )  
 )

I certify under penalty of perjury under the laws of the State of Washington that on this 26th day of January, 2015, I caused a true and correct copy of the *ADDITIONAL STATEMENT OF AUTHORITIES* to be served on:

WASHINGTON STATE SUPREME COURT  
Temple of Justice  
Attention: Susan L. Carlson, Deputy Clerk  
PO Box 40929  
Olympia, WA 98504-0929

U.S. MAIL

KITTITAS COUNTY PROSECUTOR'S OFFICE  
Attn: Gregory Zempel  
205 West 5<sup>th</sup> Avenue, Suite 213  
Ellensburg, Washington 98926-2887  
[greg.zempel@co.kittitas.wa.us](mailto:greg.zempel@co.kittitas.wa.us)

E-FILE (per  
agreement)

CERTIFICATE OF SERVICE

JOSEPH L. SHOUSE #763792  
Airway Heights Correction Center  
PO Box 2049, I-A-15  
Airway Heights, Washington 99001

U.S. MAIL

NIELSEN, BROMAN & KOCH, PLLC  
Attn: Christopher Gibson  
1908 East Madison Street  
Seattle, Washington 98122-2842  
[gibsonc@nwattorney.net](mailto:gibsonc@nwattorney.net)

E-FILE (per  
agreement)

s/ Dennis W. Morgan

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Dennis W. Morgan, Attorney at Law  
DENNIS W. MORGAN LAW OFFICE  
P.O. Box 1019  
Republic, WA 99166  
(509) 775-0777  
Fax: (509) 775-0776  
[nodbispk@rcabletv.com](mailto:nodbispk@rcabletv.com)

CERTIFICATE OF SERVICE