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No. 91644-6
SUPREME COURT
OF THE STATE OF WASHINGTON

FRED BINSCHUS, individually and as
Personal Representative of the Estate of
JULIE ANN BINSCHUS; TONYA
FENTON; TRISHA WOODS; TAMMY
MORRIS; JOANN GILLUM, as
Personal Representative of the Estate of
GREGORY N. GILLUM; CARLA J.
LANGE, individually and as Personal
Representative of the Estate of LEROY
B. LANG; NICHOLAS LEE LANGE,
Individually and as Personal
Representative of the Estate of
CHESTER M. ROSE; STACY ROSE,
Individually; RICHARD TRESTON and
CAROL TRESTON, and the marital
community thereof; BEN MERCADO;
and PAMELA RADCLIFFE, individually
and as Personal Representative of the
Estate of DAVID RADCLIFFE, and
TROY GIDDINGS, individually,

Respondents,

v.

STATE OF WASHINGTON,
DEPARTMENT OF CORRECTIONS;
SKAGIT EMERGENCY
COMMUNICATIONS CENTER d/b/a
"Skagit 911," an interlocal government
agency; SKAGIT COUNTY, a political
subdivision of the State of Washington;
OKANOGAN COUNTY, a political
subdivision of the State of Washington,

Petitioners.

PETITIONERS' SECOND
STATEMENT OF
ADDITIONAL
AUTHORITY
(RAP 10.8)

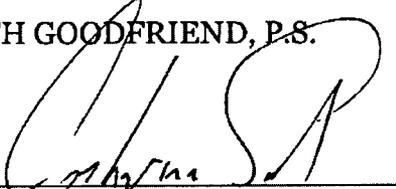


Petitioner Skagit County submits the following additional authority:

Volk v. Demeerleer, 184 Wn. App. 389, 337 P.3d 372 (2014),
rev. granted, __ Wn.2d __, __ P.3d __ (July 8, 2015).

Dated this 17th day of June, 2015.

SMITH GOODFRIEND, P.S.

By: 

Howard M. Goodfriend

WSBA No. 14355

Catherine W. Smith,

WSBA No. 9542

1619 8th Avenue North
Seattle, WA 98109
(206) 624-0974

Attorneys for Petitioner Skagit County

DECLARATION OF SERVICE

The undersigned declares under penalty of perjury, under the laws of the State of Washington, that the following is true and correct:

That on July 17, 2015, I arranged for service of the foregoing Petitioners' Second Statement of Additional Authority, to the court and to the parties to this action as follows:

Office of Clerk Washington Supreme Court Temple of Justice P.O. Box 40929 Olympia, WA 98504-0929	<input type="checkbox"/> Facsimile <input type="checkbox"/> Messenger <input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> E-Mail
John E. Justice Law Lyman Daniel Kamerrer et al P.O. Box 11880 Olympia, WA 98508	<input type="checkbox"/> Facsimile <input type="checkbox"/> Messenger <input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> E-Mail
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Dean Brett Brett Murphy Coats Knapp McCandlis Brown P.O. Box 4196 Bellingham, WA 98227	<input type="checkbox"/> Facsimile <input type="checkbox"/> Messenger <input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> E-Mail
Mark R. Bucklin Keating Bucklin & McCormack Inc. P.S. 800 5th Avenue, Suite 4141 Seattle, WA 98104	<input type="checkbox"/> Facsimile <input type="checkbox"/> Messenger <input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> E-Mail

<p>Joshua Choate Paul J. Triesch Attorney General's Office 800 5th Avenue, Suite 2000 Seattle, WA 98104</p>	<p><input type="checkbox"/> Facsimile <input type="checkbox"/> Messenger <input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> E-Mail</p>
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<p>John R. Connelly, Jr. Nathan P. Roberts Connelly Law Offices 2301 N. 30th Street Tacoma, WA 98403</p>	<p><input type="checkbox"/> Facsimile <input type="checkbox"/> Messenger <input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> E-Mail</p>
<p>Jeffrey D. Dunbar Ogden Murphy Wallace PLLC 901 5th Avenue, Suite 3500 Seattle, WA 98164</p>	<p><input type="checkbox"/> Facsimile <input type="checkbox"/> Messenger <input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> E-Mail</p>
<p>Christopher J. Kerley Evans, Craven & Lackie, P.S. 818 W. Riverside Avenue, Suite 250 Spokane, WA 99201</p>	<p><input type="checkbox"/> Facsimile <input type="checkbox"/> Messenger <input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> E-Mail</p>
<p>Eugene R. Moses Law Offices of Gene R. Moses P.S. 2200 Rimland Drive, Suite 115 Bellingham, WA 98226-6639</p>	<p><input type="checkbox"/> Facsimile <input type="checkbox"/> Messenger <input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> E-Mail</p>
<p>Philip A. Talmadge Talmadge/Fitzpatrick 2775 Harbor Avenue SW Third Floor, Suite C Seattle, WA 98126</p>	<p><input type="checkbox"/> Facsimile <input type="checkbox"/> Messenger <input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> E-Mail</p>
<p>Michael P. Lynch Office of the Attorney General P.O. Box 40126 Olympia, WA 98504-0126</p>	<p><input type="checkbox"/> Facsimile <input type="checkbox"/> Messenger <input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> E-Mail</p>

Daniel B. Heid Auburn City Attorney 25 West Main Street Auburn, WA 98001	<input type="checkbox"/> Facsimile <input type="checkbox"/> Messenger <input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> E-Mail
Rebecca Boatright Seattle City Attorneys Office 701 5 th Avenue, Suite 2050 Seattle, WA 98104	<input type="checkbox"/> Facsimile <input type="checkbox"/> Messenger <input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> E-Mail
Shannon M. Ragonesi Keating, Bucklin & McCormack, Inc., P.S. 800 5 th Avenue, Suite 4141 Seattle, WA 98104	<input type="checkbox"/> Facsimile <input type="checkbox"/> Messenger <input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> E-Mail

DATED at Seattle, Washington this 17th day of July, 2015.

V. Vigoren

Victoria K. Vigoren

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To: Victoria Vigoren
Cc: Catherine Smith; Howard Goodfriend; 'jjustice@lldkb.com'; 'Marry@lldkb.com'; 'arned@co.skagit.wa.us'; 'jaimeallen@dwt.com'; 'KeithMorton@dwt.com'; 'dbrett@brettlaw.com'; 'mbucklin@kbmlawyers.com'; 'joshuac1@atg.wa.gov'; 'pault@atg.wa.gov'; 'wmc@cnrlaw.com'; 'sue@cnrlaw.com'; 'jconnelly@connelly-law.com'; 'nroberts@connelly-law.com'; 'jdunbar@omwlaw.com'; 'ckerley@ecl-law.com'; 'gene@genemoses.net'; 'phil@tal-fitzlaw.com'; MikeL@ATG.WA.GOV; dheid@auburnwa.gov; rebecca.boatright@seattle.gov; sragonesi@kbmlawyers.com
Subject: RE: Binschus v. Skagit County et al.

Received 7-17-15

Supreme Court Clerk's Office

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Subject: Binschus v. Skagit County et al.

Attached for filing in pdf format is Petitioners' Second Statement of Additional Authority, in *Binschus v. Skagit County, et al.*, Cause No. 91644-6. The attorney filing this document is Catherine W. Smith, WSBA No. 9542, e-mail address: cate@washingtonappeals.com.

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