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SUPREME COURT
STATE OF WASHINGTON
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No. 91876-7 IN THE SUPREME COURT OF THE STATE OF WASHINGTON

In re the Detention of:		•	Petitioner's Answer to State's Motion to Supplement	
Brent Pettis,)		
ŕ	Petitioner.)	RAP 9.10	
)		
)		

The state's motion to supplement the record should be denied.

The order from June of 2015 was not before the trial court when it denied Mr. Pettis's motion for transfer to SCTF in September of 2013. RP 1327-1331, 1354. Nor did the Court of Appeals have the order before it when it issued its part-published opinion on June 4, 2015.

Furthermore, as of September 4th, the trial court had not yet entered a formal LRA order, and Mr. Pettis remains at the Special Commitment Center. *See* Declaration of Counsel. The recent LRA trial and entry of the handwritten order on June 22nd does not undermine Mr. Pettis's argument that in September of 2013, a private LRA was not available. *See* State's Motion to Supplement, p. 2.

The record is "sufficiently complete to permit a decision on the merits." RAP 9.10. The Supreme Court should deny the state's request.

Answer to State's Motion to Supplement - 1

BACKLUND & MISTRY

Attorneys at Law

P.O. Box 6490 Olympia, WA 98507 (360) 339-4870 backlundmistry@gmail.com



Signed September 9, 2015 in Olympia, Washington.

Respectfully submitted,

Dank R. Mistry

Manek R. Mistry, WSBA No. 22922 Attorney for Defendant/Appellant

Answer to State's Motion to Supplement - 2

BACKLUND & MISTRY

Attorneys at Law

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8 9	No. 91876-7 IN THE SUPREME COURT OF THE STATE OF WASHINGTON			
10	In re the Detention of: Declaration of Counsel and Certificate of Service			
12	Brent Pettis,) Petitioner.)			
13 14	Manek R. Mistry declares as follows:			
15	1. Our office represents Brent Pettis on appeal. We filed a Petition for Review on his behalf.			
16	2. On September 4, 2015, I spoke by phone with Mr. Pettis's trial counsel, Jennifer McIntyre. She			
17	indicated that a formal LRA order had not yet been entered. She expected that a formal order			
18	would be entered soon.			
19	3. CERTIFICATE OF SERVICE			
20				
21	I certify that on September 9, 2015, I sent an electronic copy of this document to the attorney general (at crjsvpef@atg.wa.gov).			
22 23	I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.			
24	Signed September 9, 2015 in Olympia, Washington.			
25 26	Llande R. Il isery			
27 28	Manek R. Mistry, WSBA No. 22922 Attorney for Defendant/Appellant			

Declaration and Certificate of Service - 2

BACKLUND & MISTRY

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To:

Backlund & Mistry; Sappington, Sarah (ATG); crjsvpef@atg.wa.gov

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Received on 09-09-2015

Supreme Court Clerk's Office

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From: Backlund & Mistry [mailto:backlundmistry@gmail.com]

Sent: Wednesday, September 09, 2015 6:51 AM

To: OFFICE RECEPTIONIST, CLERK <SUPREME@COURTS.WA.GOV>; Sappington, Sarah (ATG) <sarahs@atg.wa.gov>;

crisvpef@atg.wa.gov

Subject: 91876-7-In re the Detention of Brent Pettis-Answer to State's Motion to Supplement

Attached is Petitioner's Answer to State's Motion to Supplement.

Thank you.

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