

Court of Appeal Case No. 73514-4-I

93332-4

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

JOSHUA J. WOOLCOTT, Petitioner/Appellant,

v.

CITY OF SEATTLE, Respondent.

PETITIONER'S STATEMENT OF ADDITIONAL AUTHORITIES

Anthony C. Johnson, WSBA# 18073 Attorney for Joshua J. Woolcott, Petitioner

LAW OFFICES OF ANTHONY C. JOHNSON 1700 7th Avenue, Suite 2200 Seattle, WA 98101 206-582-3500



STATEMENT OF ADDITIONAL AUTHORITIES

Pursuant to RAP 18.8, Petitioner Joshua J. Woolcott submits the following statement of additional authorities:

Regarding Respondent City of Seattle's ("Seattle") claim that its duty is confined to the boundary of a crosswalk (Seattle Ans. to Pet. for Rev., at pp. 1, 8-14): Compare *Wuthrich v. King County*, 185 Wn.2d 19, 26-27, 36 P.3d 926 (2016) (holding municipality's duty to provide reasonably safe roads was not limited to conditions that exist in the roadway itself).

Dated this 1st day of September, 2016.

Respectfully submitted,

othony Q. Johnson, WSBA #18073

Attorneys for Petitioner Joshua J. Woolcott

RECEIVED ELECTRONICALLY

Court of Appeal Case No. 73514-4-I

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

JOSHUA J. WOOLCOTT,
Petitioner/Appellant,

VS.

CITY OF SEATTLE, Respondent.

CERTIFICATE/PROOF OF SERVICE RE: PETITIONER'S STATEMENT OF

ADDITIONAL AUTHORITIES

I, Anthony C. Johnson, attorney for Petitioner/Appellant Joshua J. Woolcott, certify that on the 1st day of September, 2016, caused a true and correct copy of

(1) PETITIONER'S STATEMENT OF ADDITIONAL AUTHORITIES

to be served on the Respondent's attorney at the address and in the following manner indicated below:

Counsel for Respondents/Defendants City of Seattle:

(X) Hand Deliver

ROBERT TAD SEDER, WSBA#14521

(X) Email

Assistant City Attorney
PETER S. HOLMES
Seattle City Attorney
Civil Division

701 Fifth Avenue, Suite 2050 Seattle, WA 98104-7097

TEL: 206-684-8234/206-727-8498

FAX: 206-684-8284

E-Mail: Tad.Seder@seattle.gov

DATED this 1st day of September, 2016.

Aprhony C. Johnson, WSBA #18073

Attorneys for Petition er/Appellant Joshua J. Woolcott

Law Offices of Anthony C Johnson

1700 7th Ave., Ste/2200

E-mail: tony@anthonycjohnsonlaw.com

OFFICE RECEPTIONIST, CLERK

From:

OFFICE RECEPTIONIST, CLERK

Sent:

Thursday, September 01, 2016 12:29 PM

To:

'Ann Maki'; Tad.Seder@seattle.gov

Cc:

Anthony C. Johnson

Subject:

RE: Woolcott vs. Seattle (Court of Appeal Case No. 73514-4-1 - Petitioner's Statement of

Additional Authorities

Received 9/1/16.

Supreme Court Clerk's Office

Please note that any pleading filed as an attachment to e-mail will be treated as the original. Therefore, if a filing is by e-mail attachment, it is not necessary to mail to the court the original of the document.

Questions about the Supreme Court Clerk's Office? Check out our website:

http://www.courts.wa.gov/appellate_trial_courts/supreme/clerks/

Looking for the Rules of Appellate Procedure? Here's a link to them:

http://www.courts.wa.gov/court_rules/?fa=court_rules.list&group=app&set=RAP

Searching for information about a case? Case search options can be found here:

http://dw.courts.wa.gov/

From: Ann Maki [mailto:ann@anthonycjohnsonlaw.com]

Sent: Thursday, September 01, 2016 12:03 PM

To: OFFICE RECEPTIONIST, CLERK <SUPREME@COURTS.WA.GOV>; Tad.Seder@seattle.gov

Cc: Anthony C. Johnson <tony@anthonycjohnsonlaw.com>

Subject: Woolcott vs. Seattle (Court of Appeal Case No. 73514-4-1 - Petitioner's Statement of Additional Authorities

Please find the Petitioner's Statement of Additional Authorities.

Ann Maki, Paralegal



Law Offices of Anthony C. Johnson 1700 Seventh Avenue, Suite 2200

Seattle, WA 98101-4415

T 206.582 3500 F 855.566 5366 - Please note new fax number --

www.anthonycjohnsonlaw.com

This message is privileged & confidential attorney work product/attorney-client communication and is intended solely for the use of the individual named above.