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# IN THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,	) No. 96074-7 COA No. 76206-1-I
Respondent, v. ROBERT JACKSON,	) STATEMENT OF ) ADDITIONAL ) AUTHORITIES ) ON PENDING PETITION ) FOR REVIEW
Petitioner.	)

Petitioner Robert Jackson (Petition for Review filed July 13, 2018) respectfully requests that this Court consider the following supplemental authority on the issue of facial invalidity:

• <u>State v. Blair</u>, \_\_\_ Wn.2d \_\_\_, 421 P.3d 937, 940–42 (Supreme Court No. 93995-1, July 26, 2018) (party addressing facial validity issue as to prior conviction for use in criminal history at present sentencing could not rely on charging document/information).

Respectfully submitted this 2ND day of October 2018

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# DECLARATION OF FILING AND MAILING OR DELIVERY

The undersigned certifies under penalty of perjury under the laws of the State of Washington that on the below date, the original of the document to which this declaration is affixed/attached, was filed in the Washington State Supreme Court under Case No. 96074-7, and a true copy was mailed with first-class postage prepaid or otherwise caused to be delivered to the following attorney(s) or party/parties of record at their regular office or residence address as listed on ACORDS:

respondent Ann Summers, DPA [PAOAppellateUnitMail@kingcounty.gov] [ann.summers@kingcounty.gov] King County Prosecutor's Office – Appellate Unit
appellant
Attorney for other party

MARIA ANA ARRANZA RILEY, Legal Assistant Washington Appellate Project

Date: October 2, 2018

## WASHINGTON APPELLATE PROJECT

October 02, 2018 - 4:07 PM

# **Transmittal Information**

Filed with Court: Supreme Court

**Appellate Court Case Number:** 96074-7

**Appellate Court Case Title:** State of Washington v. Robert Terrance Jackson Jr.

**Superior Court Case Number:** 15-1-05809-2

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