# **FILED** SUPREME COURT STATE OF WASHINGTON 10/13/2021 11:14 AM BY ERIN L. LENNON

CLERK

SUPREME COURT OF THE STATE OF WASHINGTON	
STATE OF WASHINGTON,	) ) No. 99730-6
Respondent,	) No. 99730-6 ) ) PETITIONER'S
v.	) STATEMENT OF ) ADDITIONAL
PALLA SUM,	) AUTHORITIES
Petitioner.	) ) )
Pursuant to RAP 10.8, the petitioner respectfully cites the following additional authority as pertinent to the issue, set forth	
in the petition for review, of whether the petitioner was seized:	
State v. Orozco, Wn. App. 2d, P.3d, 2021 WL 4621343, *6 (Oct. 7, 2021) (appropriate to consider experience of "one who has experienced life as a person of color" in applying objective observer test under GR 37) (Pennell, C.J., concurring).	
DATED this 13 <sup>th</sup> day of October, 2021.	
Respectfully submitted,	
NIEI SEN KOCH DI I C	

JENNIFER WINKLER, WSBA No. 35220 Office ID No. 91051 Attorneys for Petitioner

### **NIELSEN KOCH PLLC**

## October 13, 2021 - 11:14 AM

### **Transmittal Information**

Filed with Court: Supreme Court

**Appellate Court Case Number:** 99730-6

**Appellate Court Case Title:** State of Washington v. Palla Sum

**Superior Court Case Number:** 19-1-01329-1

#### The following documents have been uploaded:

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Statement of Additional Authorities

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#### **Comments:**

Sender Name: Jennifer Winkler - Email: winklerj@nwattorney.net

Address:

1908 E MADISON ST

SEATTLE, WA, 98122-2842

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