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SUPREME COURT  
STATE OF WASHINGTON  
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IN THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON, )  
Respondent, )  
v. )  
ALLEN GREGORY, )  
Appellant. )

No. 88086-7

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STATEMENT  
OF ADDITIONAL  
AUTHORITIES  
(RAP 10.8)

Pursuant to RAP 10.8, appellant Allen Gregory submits the  
following statement of additional authorities: *Glossip v. Gross*, 576 U.S.

\_\_\_\_ (No. 14-7955, filed 6/29/15) (Breyer, J., dissenting):

In 1976, the Court thought that the constitutional infirmities  
in the death penalty could be healed; ... Almost 40 years of  
studies, surveys, and experience strongly indicate, however,  
that this effort has failed.

*Id.* at 2. *See also id.* at 9-17 (explaining that death penalty is imposed  
arbitrarily and based on race and geography rather than egregiousness of  
the crime); *id.* at 37-38 (citing Governor Inslee's moratorium and the  
American Law Institute's withdrawal of the model penal code); *id.* at 40  
(noting it is the responsibility of the judiciary to enforce the Eighth  
Amendment).

Respectfully submitted this 16th day of July, 2015.

s/ Lila J. Silverstein  
s/ Neil M. Fox  
LILA J. SILVERSTEIN (38394)  
NEIL M. FOX (15277)  
Attorneys for Appellant

Statement of Additional Authorities

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☒ respondent Kathleen Proctor, DPA; John Neeb, DPA  
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Pierce County Prosecutor's Office

☐ appellant

☐ Attorney for other party



MARIA ANA ARRANZA RILEY, Legal Assistant  
Washington Appellate Project

Date: July 16, 2015

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**Statement of Additional Authorities**

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