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April 29, 2025

Washington Supreme Court
P.O. Box 40929
Olympia, WA 98504

Re: Proposed Amendment of GR 14

Dear Justices:

The Washington Appellate Project supports the proposed change to GR 14 to eliminate the requirement of parallel citations for United States Supreme Court cases. The near ubiquitous use of electronic research renders the requirement an unnecessary relic of the past. For the same reasons, we encourage the Court to consider taking the proposal further; to eliminate the requirement of parallel citations for other case citations as well, including Washington cases.

We offer one additional consideration. Many of our clients are entitled to file Statements of Additional Grounds under RAP 10.10. That rule already provides that legal citations are not required so long as the person's claim is apparent. However, on occasion courts have refused to consider claims that lack citation to legal authority. Understandably then, many individuals strive to include accurate citations in their Statement of Additional Grounds. Because reliable access to legal materials for incarcerated individuals has varied widely over time, we encourage the Court to consider an explicit exception in GR 14 permitting citation to either the official or other unofficial reporter for Statements of Additional Grounds.

Sincerely,

A handwritten signature in dark ink, appearing to read "Gregory C. Link", written in a cursive style.

Gregory C. Link, Director
Attorney At Law

From: [OFFICE RECEPTIONIST, CLERK](#)
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Date: Wednesday, April 30, 2025 8:55:54 AM
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[Wash. App. Proj. Comment CrR 3.1, CrRLJ 3.1, JuCR 9.2 \(appeals\).pdf](#)
[Wash. App. Proj. Comment GR 14.pdf](#)
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From: Greg Link <greg@washapp.org>
Sent: Wednesday, April 30, 2025 8:54 AM
To: OFFICE RECEPTIONIST, CLERK <SUPREME@COURTS.WA.GOV>
Subject: Washington Appellate Project Comments

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Please find attached the Washington Appellate Project's comments on the following proposed rule changes:

CrR 3.1/CrRLJ 3.1/JuCR 9.2 Standards for Indigent Defense(appellate)
GR 14
RAP 10.2
RAP 18.17



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