FILED SUPREME COURT STATE OF WASHINGTON 10/24/2022 10:17 AM BY ERIN L. LENNON CLERK

SUPREME COURT OF THE STATE OF WASHINGTON

GABRIEL PORTUGAL, et al., No. 100999-2 Respondents, STATEMENT OF ADDITIONAL AUTHORITIES FRANKLIN COUNTY, Defendant, and

JAMES GIMENEZ,

Appellant.

The respondents Portugal, submit the following additional authorities to the Court pursuant to RAP 10.8: *Henderson v. Thompson*, __Wn. 2d __, __P.3d __, 2022 WL 11469892 (2022) at *1. There, this Court reinforced its "duty to increase access to justice, reduce and eradicate racism and prejudice, and continue to develop our legal system into one that serves the ends of justice." Similarly, the Washington Voting Rights Act, RCW 29A.92, seeks to achieve the same ends in making sure that racial groups are not deprived of their proper participation in Statement of Additional Authorities - 1 Talmadge/Fitzpatrick 2775 Harbor Avenue SW

2775 Harbor Avenue SW Third Floor, Suite C Seattle, WA 98126 (206) 574-6661 government by embedded racism in the structure of local governments. Direct review by this Court of the trial court's decision to uphold the WVRA is merited.

This document contains 117 words, excluding the parts of the document exempted from the word count by RAP 18.17.

DATED this 24th day of October, 2022.

Respectfully submitted,

<u>/s/ Philip A. Talmadge</u> Philip A. Talmadge, WSBA #6973 Talmadge/Fitzpatrick 2775 Harbor Avenue SW Third Floor, Suite C Seattle, WA 98126 (206) 574-6661

Edwardo Morfin WSBA #20243 Morfin Law Firm PLLC 7325 West Deschutes Avenue Suite A Kennewick, WA 99336-6705 (509) 380-9999 Chad W. Dunn Pro Hac Vice pending Sonni Waknin Bernadette Reyers Admitted Pro Hac Vice UCLA Voting Rights Project 3250 Public Affairs Building Los Angeles, CA 90065 (310) 206-8431

Attorneys for Respondents

Statement of Additional Authorities - 3

Talmadge/Fitzpatrick 2775 Harbor Avenue SW Third Floor, Suite C Seattle, WA 98126 (206) 574-6661

DECLARATION OF SERVICE

On said day below, I electronically served a true and accurate copy of the *Statement of Additional Authorities* in Supreme Court Cause No. 100999-2 to the following parties:

Edwardo Morfin Morfin Law Firm PLLC 7325 West Deschutes Avenue Suite A Kennewick, WA 99336-6705

Chad W. Dunn Sonni Waknin Bernadette Reyers *Pro Hac Vice* applications pending UCLA Voting Rights Project 3250 Public Affairs Building Los Angeles, CA 90065

Joel Bernard Ard Ard Law Group PLLC P.O. Box 11633 Bainbridge Island, WA 98110-5633

Francis S. Floyd Amber L. Pearce Floyd Pflueger & Ringer PS 3101 Western Avenue, Suite 400 Seattle, WA 98121-3017

Original E-filed via appellate portal: Supreme Court Clerk's Office

I declare under penalty of perjury under the laws of the State of Washington and the United States that the foregoing is true and correct.

DATED: October 24, 2022 at Seattle, Washington.

/s/ Brad Roberts Brad Roberts, Legal Secretary Talmadge/Fitzpatrick

TALMADGE/FITZPATRICK

October 24, 2022 - 10:17 AM

Transmittal Information

Filed with Court:	Supreme Court
Appellate Court Case Number:	100,999-2
Appellate Court Case Title:	Gabriel Portugal et al. v. Franklin County et al.
Superior Court Case Number:	21-2-50210-4

The following documents have been uploaded:

 1009992_State_of_Add_Authorities_20221024101625SC840250_5590.pdf This File Contains: Statement of Additional Authorities The Original File Name was Statement of Additional Authorities.pdf

A copy of the uploaded files will be sent to:

- ADaylong@floyd-ringer.com
- APearce@floyd-ringer.com
- Bernadette@uclavrp.org
- Eddie@MorfinLawFirm.com
- Sonni@uclavrp.org
- amuul@floyd-ringer.com
- brad@tal-fitzlaw.com
- christine@tal-fitzlaw.com
- ecampbell@floyd-ringer.com
- eddie4um509@yahoo.com
- ffloyd@floyd-ringer.com
- joel@ard.law
- sklotz@floyd-ringer.com

Comments:

Statement of Additional Authorities

Sender Name: Brad Roberts - Email: brad@tal-fitzlaw.com **Filing on Behalf of:** Philip Albert Talmadge - Email: phil@tal-fitzlaw.com (Alternate Email: matt@tal-fitzlaw.com)

Address: 2775 Harbor Avenue SW Third Floor Ste C Seattle, WA, 98126 Phone: (206) 574-6661

Note: The Filing Id is 20221024101625SC840250