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SUPREME COURT  
STATE OF WASHINGTON  
10/27/2020 4:02 PM  
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No. 98824-2

IN THE SUPREME COURT  
OF THE STATE OF WASHINGTON

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CITY OF SEATTLE,

*Respondent,*

v.

STEVEN G. LONG,

*Petitioner.*

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**ANSWER TO AMICUS MEMORANDA**

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Three amicus memoranda have been filed in support of Mr. Long’s petition for review. None of them address the points raised in the City’s answer to the petition for review, starting with the indisputable fact that Mr. Long is not an aggrieved party with standing to seek further review. Instead, *amici* largely repeat arguments made to the Court of Appeals, which the City earlier refuted and the Court of Appeals rejected.<sup>1</sup>

To the extent that any amicus seeks to raise a new argument, the City’s answer to the petition of review explains why that argument is without merit. *Compare* Brief of Amici Curiae Institute for Justice and Fines and Fees Justice Center (Sept. 25, 2020) *with* Answer to Petition for Review (Aug. 27, 2020) at 6–13; *compare* Brief of WACDL as Amicus Curiae (Sept. 24, 2020) *with* Answer to Petition for Review (Aug. 27, 2020) at 14–16.

## CONCLUSION

Mr. Long is not an aggrieved party, and he fails to show any basis for review under RAP 13.4(b). The amicus memoranda do not, either. The Court should, therefore, deny Mr. Long’s petition for review.

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<sup>1</sup> See City of Seattle’s Answer to Amicus Brief of National Law Center on Homelessness and Poverty and the Homeless Rights Advocacy Project (June 21, 2019).

DATED this 27th day of October 2020.

Respectfully submitted,

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**October 27, 2020 - 4:02 PM**

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**Appellate Court Case Title:** City of Seattle v. Steven Gregory Long

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