

No. 98824-2

**SUPREME COURT OF THE STATE OF WASHINGTON**

CITY OF SEATTLE,  
  
Respondent/Cross-Petitioner,  
  
v.  
  
STEVEN G. LONG,  
  
Petitioner/Cross-Respondent.

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CITY OF SEATTLE'S  
STATEMENT OF  
ADDITIONAL AUTHORITIES

In accordance with RAP 10.8, respondent/cross-petitioner City of Seattle files this statement of additional authorities.

1. On the issue of whether impounding a vehicle and imposing a parking fine violate the Excessive Fines Clause:

*Potter v. City of Lacey*, No. 3:20-cv-05925-RJB, 2021 WL 915138 (W.D. Wash. Mar. 10, 2021)

*Tsinberg v. City of New York*, 20 Civ. 749 (PAE), 2021 WL 1146942 (S.D.N.Y. Mar. 25, 2021)

2. On the issue of whether temporary impoundment of a vehicle by the government constitutes a fine if the car is not ultimately forfeited:

*Sutton v. Leesburg, Ala.*, No. 4:20-cv-00091-ACA, 2021 WL 1264244 (N.D. Ala. Apr. 6, 2021)

3. On the issue of whether a person's unwillingness to comply with the law is a factor that courts consider in determining whether a fine is excessive under the Eighth Amendment:

*Lent v. Cal. Coastal Comm'n*, 62 Cal. App. 5th 812, 859 (Cal. Ct. App. 2021)

Respectfully submitted this 25th day of June 2021.

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## Transmittal Information

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**Appellate Court Case Number:** 98824-2  
**Appellate Court Case Title:** City of Seattle v. Steven Gregory Long

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