

1996

# The State of Utah v. Angelo Giron : Unknown

Utah Court of Appeals

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Kenneth A. Bronston, Assistant Attorney General.

Linda M. Jones.

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UTAH COURT OF APPEALS  
BRIEF

STATE OF UTAH  
OFFICE OF THE ATTORNEY GENERAL

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COURT OF APPEALS

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March 18, 1997

Marilyn Branch  
Clerk of the Court  
Utah Court of Appeals  
230 South 500 East  
Salt Lake City, Utah 84102

Re: State v. Giron, Case No. 960203-CA

Dear Ms. Branch:

Regarding the issue of temporal proximity in search incident to arrest, focussed on by the Court at oral argument, I wish to cite 3 Wayne R. LaFave, Search & Seizure § 7.1(c) (3rd ed. 1996) ("the fact that in almost all cases the search will be undertaken at the place of arrest is, as a practical matter, likely to overcome any problems as to temporal proximity"), referred to in the State's reply brief at page 4, but which counsel failed to mention at oral argument.

This supplemental authority is submitted pursuant to rule 24(i), Utah Rules of Appellate Procedure.

Respectfully,

Kenneth A. Bronston  
Assistant Attorney General

cc: Linda M. Jones