

2001

## State of Utah v. Pearl Topanotes : Unknown

Utah Supreme Court

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STATE OF UTAH  
OFFICE OF THE ATTORNEY GENERAL



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**FILED**  
UTAH SUPREME COURT

MAY 02 2003

PAT BARTHOLOMEW  
CLERK OF THE COURT

RAYMOND A. HINTZE  
Chief Deputy

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Chief Deputy

May 1, 2003

Patricia Bartholomew  
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450 South State  
P.O. Box 140210  
Salt Lake City, Utah 84114-0210


Re: *State v. Topanotes*, Case No. 20010127-SC

Dear Ms. Bartholomew:

Pursuant to rule 24(i), Utah Rules of Appellate Procedure, I am citing *United States v. Segura*, 468 U.S. 796, 815-816 & n.10 (1984), and *United States v. Corral-Corral*, 899 F.2d 927, 930 (10<sup>th</sup> Cir. 1990), as supplemental authority in support of the State's argument that the inevitable discovery doctrine requires no absolute proof, beyond evidence of predictable police routine, of what would have hypothetically occurred absent the illegality. *See* Cross-Pet. Reply Br. at 3-7, 11-13. This case is scheduled for oral argument on Wednesday, 7 May 2003.

I appreciate your prompt distribution of this letter and supplemental authority to the Court.

Sincerely,

  
MARIAN DECKER  
Assistant Attorney General

cc: Linda M. Jones