

1989

Kate Greenwood; Andrew Greenwood; and Ralph Greenwood, President Of American Dog Breeders' Association, Inc. v. City of North Salt Lake :
Unknown

Utah Supreme Court

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UTAH SUPREME COURT

BRIEF

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December 11, 1990

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Honorable Justices
Utah Supreme Court
332 Utah State Capitol Building
Salt Lake City, Utah 84114

Clerk, Supreme Court, Utah

Re: Greenwood et al. vs. City of North Salt Lake
Supreme Court Case No. 890355
Oral Argument December 11, 1990

Dear Justices of the Supreme Court:

Since the filing of the briefs in this matter, it has come to my attention that several appellate courts in the Pacific Region, and several other courts of review throughout the country, have specifically addressed the due process, equal protection, and "pit bull" identification issues raised in this appeal. For that reason, pursuant to Utah Rules of Appellate Procedure, Rule 24(j), I am providing the following list of supplemental authorities.

Hearn v. City of Overland Park, 244 Kan. 638, 772 P.2d 758, cert denied 107 L.Ed.2d 503, 110 S.Ct. 500 (1989).

Garcia v. Village of Tijeras, 108 N.M. 116, 767 P.2d 355, cert denied 107 N.M. 785, 765 P.2d 758 (1988).

State v. Robinson, 44 Ohio App.3d 128, 541 N.E.2d 1092 (Ohio App. 1989).

State v. Peters, 534 So.2d 760 (Fla. App. 1988).

Vanater v. Village of South Point, 717 F.Supp. 1236 (S.D. Ohio 1989).

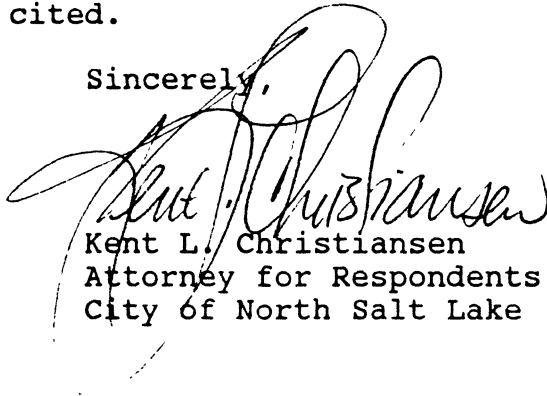
American Dog Owners Ass'n, Inc. v. Dade County, 728 F.Supp. 1533 (S.D. Fla. 1989).

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City of Lima v. McFadden, (3rd App.D., Allen Cty., Ohio,
June 30, 1986) (Unreported decision).

Your consideration of the rulings in the above referenced cases as they pertain to this appeal is appreciated. I have provided opposing counsel a copy of this letter, and I understand that he has an opportunity to similarly respond to the cases cited.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kent L. Christiansen", is written over the typed name and title. The signature is fluid and cursive.

Kent L. Christiansen
Attorney for Respondents
City of North Salt Lake

KLC:hm
cc: David Paul White