

1995

## Utah v. Dahlquist : Unknown

Utah Court of Appeals

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Jan Graham; Attorney General; Attorney for Plaintiff/Respondent.

Kent E. Snider; Box Elder Public Defender; Attorney for Defendant/Appellant.

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OFFICE OF THE ATTORNEY GENERAL



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**FILED**  
Utah Court of Appeals  
**OCT 25 1996**  
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**UTAH COURT OF APPEALS  
BRIEF**

UTAH  
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DOCKET NO. 950757-CA

Re: State v. Dahlquist, Case No. 950757-CA

Dear Ms. Branch,

Pursuant to Utah R. App. P. 24(i), the following supplemental citations are provided in response to questions during oral argument yesterday:

- Judge Orme asked if the State conceded that the Court had to be convinced of harmless error "beyond a reasonable doubt" where there was a Miranda violation. To clarify its answer, the State refers the Court to pages 23 through 27 of its brief.

- Judge Orme also asked if there were authority for police to read a suspect Miranda warnings after the suspect has already invoked the right to counsel. To supplement its answer, referring the Court to footnote 5 on page 19 of its brief, the State provides the following citations of authority:

Miranda v. Arizona, 86 S.Ct. 1602, 1626-1630 (1966) (beginning with the paragraph preceded by "[33-35]" through the end of section III. of the opinion)

10 ALR3d 1054 (1966)

Sincerely,

Barnard N. Madsen  
Assistant Attorney General

cc: Kent E. Snider