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Frank Griswold
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October 17, 2020

Clerk of the Supreme Court
303 K Street
Anchorage, AK 99501

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FCCir 10-23-20 J

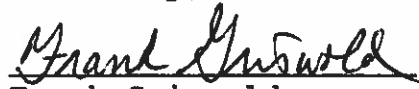
Re: Supreme Court Case S-16267

Dear Supreme Court Clerk:

Pursuant to Appellate Rule 212(c)(12) and in support of the arguments at pages 25-29 of Appellant's Opening Brief and at pages 6-7 of Appellant's Reply Brief, Appellant Frank Griswold cites the following pertinent supplemental authority:

Ang Tibay v. Court of Industrial Relations, 69 Phil. 635 (Philippines, 1940).

Sincerely,


Frank Griswold

cc: Michael Gatti
Max Holmquist
Derek Reynolds
Catriona Reynolds