

No. 72321-9

In the Court of Appeals  
of the State of Washington  
Division I

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DEBORAH THOMSON

Appellant,

v.

JANE DOE *et al.*,

Respondent..

AVVO, INC.,

Non-party Respondent-Appellee

**JANE DOE’S STATEMENT OF SUPPLEMENTAL AUTHORITY**

Since the briefing of this appeal was completed, the following two decisions have been issued:

In *Yelp, Inc. v. Hadeed Carpet Cleaning, Inc.*, 770 S.E.2d 440 (Va. 2015), the Virginia Supreme Court reversed the decision of the Virginia Court of Appeals in *Yelp, Inc. v. Hadeed Carpet Cleaning, Inc.*, 62 Va. App. 678, 752 S.E.2d 554 (Va. App. 2014), which appellant Thomson discussed in her appellate reply brief at pages 106 to 12.

In *Music Grp. Macao Commercial Offshore Ltd. v. Does*, No. 14-MC-80328-LB, 2015 WL 930249 (N.D. Cal. Mar. 2, 2015), the court followed the lead of other federal judges in the Northern District of California in two cases cited in Doe’s brief at page 29.

Respectfully submitted,

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