

FILED
Court of Appeals
Division II
State of Washington
8/14/2023 9:30 AM

FILED
SUPREME COURT
STATE OF WASHINGTON
8/14/2023
BY ERIN L. LENNON
CLERK

IN THE COURT OF APPEALS OF THE STATE OF
WASHINGTON DIVISION TWO

102262-0

STATE OF WASHINGTON

Respondent,

v.

JONATHAN TAYLOR STAMER

Appellant.

COA NO. 56793-8-II

MOTION FOR EXTENSION OF
TIME TO FILE MOTION FOR
DISCRETIONARY REVIEW

I. IDENTITY OF MOVING PARTY

Appellant, through counsel, respectfully
requests relief designated in section 2.

II. STATEMENT OF RELIEF SOUGHT

Pursuant to RAP 9.5(b), so that the ends of justice
might be served, appellant moves the court for the entry of
an order continuing the time to file the Petitioner's Motion
for Discretionary Review to until Monday, August 14, 2023.

III. GROUND FOR RELIEF SOUGHT

As grounds for and in support of this motion,
Petitioner shows unto the Court as follows:

1. Due to a miscommunication, the Petitioner's Motion for Discretionary Review was not filed within the 30 days of the July 5, 2023, Court of Appeals decision.
2. The date the Petition was due to be filed was August 5, 2023.
3. Petitioner respectfully requests a nine-day extension to file the Petition.

IV. CONCLUSION

The requested extension is necessary and essential so that counsel for Petitioner may provide competent representation. The above continuance is not sought for purposes of delay or tactical advantage.

DATED this August 14, 2023

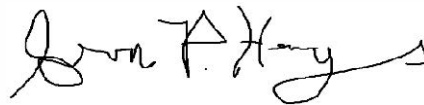
I, SHAWN P. HENNESSY, certify that the number of words in this document is 209 exclusive of the the certificate of compliance, the certificate of service and signature blocks.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Shawn P. Hennessy". The signature is fluid and cursive, with a large initial 'S' and a long, sweeping tail.

SHAWN P. HENNESSY,
WSBA No: 59801
Attorney for Appellant

I, Shawn P. Hennessy, a person over the age of 18 years of age, served the Clark County Prosecutor at prosecutor@clark.wa.gov and at cntypa.general@clark.wa.gov and Jonathan Stamer at his last known address of, a true copy of the document to which this certificate is affixed on August 14, 2023. Service was made electronically to the prosecutor and by United States mail to Jonathan Stamer at Stafford Creek Corrections Center 191 Constantine Way, Aberdeen, WA 98520 by depositing in the mails of the United States of America, properly stamped and addressed.



SHAWN P. HENNESSY,
WSBA 59801
Attorney for Appellant

LAW OFFICER OF LISE ELLNER, PLLC

August 14, 2023 - 9:30 AM

Transmittal Information

Filed with Court: Court of Appeals Division II
Appellate Court Case Number: 56793-8
Appellate Court Case Title: State of Washington, Respondent v. Jonathan Tyler Stamer, Appellant
Superior Court Case Number: 21-1-00755-1

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- 567938_Motion_20230814092945D2390683_9543.pdf
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Motion 1 - Extend Time to File
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