

FILED
SUPREME COURT
STATE OF WASHINGTON
9/1/2023
BY ERIN L. LENNON
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FILED
Court of Appeals
Division I
State of Washington
8/31/2023 4:46 PM

Case No. 102322-7

**IN THE SUPREME COURT
OF THE STATE OF WASHINGTON**

Court of Appeals Division I, Case No. 83114-3

KEITH WELCH

Defendant/Appellant,

v.

CHRIS WALDEN

Plaintiff/Respondent.

APPELLANT'S REPLY

Treated as reply to answer to motion for extension of time

Keith Welch, Defendant/Appellant
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I. REPLY

With regard to Respondent's delay arguments, it was the Respondent that had first initiated litigation against the Appellant and his son, just three (3) weeks after Respondent's acquisition of the Property.

Furthermore, it was the Respondent that had sworn under penalty of perjury, to the initial fabricated rental breach, with the Appellant and his son. And it was the Respondent that had breached an acquisition agreement between both parties.

Finally, with regard to the validity or relevance of Respondent's Declaration, Appellant replies, as follows:

- 1) There was never an August 2, 2023, 9:00 A.M. phone call, from Appellant to the Respondent.
- 2) Although, on August 2, 2023, at 9:41 A.M., Appellant did receive a gloating phone call from the Respondent, which lasted a total of (8) minutes and (29) seconds.

With regard to the balance of Respondent's Declaration, Appellant's reply is that it is nothing but a deliberate fabrication of the truth.

Throughout the history of this case, the Respondent, has had difficulty with regard to filing declarations that didn't involve false statements, made under penalty of perjury.

II. CONCLUSION

Therefore, Appellant respectfully request that this Court strike Respondent's Response from the record.

DATED this 31st day of August, 2023.

RESPECTFULLY SUBMITTED:

/s/ Keith Welch

Keith Welch, Defendant/Appellant

III. CERTIFICATE OF COMPLIANCE

The undersigned certifies that this document, exclusive of words contained in the appendices, the title sheet, the table of contents, the table of authorities, the certificate of compliance, the certificate of service, signature blocks, and pictorial images, if any, contains 194 words, in in compliance with RAP 18.17.

Respectfully submitted this 31st day of August, 2023.

/s/ Keith Welch

Keith Welch, Defendant/Appellant

DECLARATION OF SERVICE

I, Keith Welch, certify under penalty of perjury under the laws of the State of Washington, that on the day I signed this declaration of service, I caused a copy of Appellant's Reply, to be serve electronically *via* the Appellate Courts Portal, to this Court, and electronically mailed upon Counsel and Transcriptionist of record:

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SKAGIT COUNTY SUPERIOR COURT REPORTER
205 W. Kincaid, Room 202
Mount Vernon, WA 98273
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Attn: Eileen Sterns

Signed at Mount Vernon, Washington, this 31st day of August, 2023.

/s/ Keith Welch
Keith Welch, Defendant/Appellant

KEITH WELCH - FILING PRO SE

August 31, 2023 - 4:46 PM

Transmittal Information

Filed with Court: Court of Appeals Division I
Appellate Court Case Number: 83114-3
Appellate Court Case Title: Christopher Walden, Respondent v. Keith Welch, Appellant
Superior Court Case Number: 21-2-00257-8

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