

90054-0

No. 43983-2

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SUPREME COURT
STATE OF WASHINGTON
May 16, 2014, 2:01 pm
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**IN THE SUPREME COURT
OF THE STATE OF WASHINGTON**

E CRF
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JOYCE KELLEY, Individually, Respondent

v.

PIERCE COUNTY, a county corporation, MARK SKAGREN & JANE
DOE SKAGREN;

Petitioner.

MOTION FOR EXTENSION OF TIME TO FILE ANSWER TO
PETITION FOR REVIEW

LAW OFFICES OF THADDEUS P. MARTIN

Thaddeus P. Martin, WSBA # 40442
Of Attorneys for Respondent

4928 109th St. SW
Lakewood, WA 98499
(253) 682-3420

 ORIGINAL

I. Identity Of Moving Party.

Appellants request the relief designated in Part II.

II. Relief Requested.

An extension of time for filing the Respondent's Answer to Petition for Review from April 30, 2014 to May 16, 2014.

III. Facts Relevant To Motion.

This is Respondent's first request for an extension of time to file. Respondent's counsel has been unable to complete the brief due to the press of numerous other matters, including several weeks of preparation for an extensive multi-party trial in King County. Counsel for Respondent is a solo practitioner.

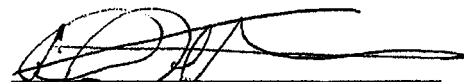
Respondent asks for a brief extension until May 16, 2014, to file her answer. No prejudice to petitioner is expected to result if this extension is granted.

IV. Conclusion.

The Court should grant this brief extension to May 16, 2014 for the Respondent to file their answer.

DATED this 16th day of May, 2014.

THADDEUS P. MARTIN,
ATTORNEY AT LAW



Thaddeus P. Martin, WSBA # 28175

CERTIFICATE OF SERVICE

I hereby certify that I am not a party to this action and that I placed for service, via email, followed by legal messenger, of the foregoing document on the following parties in the following manner(s):

Daniel Hamilton
Pierce County Prosecutor's Office
Civil Division
955 Tacoma Avenue S, Ste 301
Tacoma, WA 98402

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Executed at Lakewood, Washington on the 16th day of May, 2014.


Kara Denny, Legal Assistant