

SUPREME COURT OF WASHINGTON

FILED

E JAN 03 2017
WASHINGTON STATE
SUPREME COURT

State of Washington
Plaintiff

No. 93803-2
C.O.A. No. 73149-1-1

v.

Rosemary Kamb
Defendant

Motion for Extension of Time
to File Brief, **Motion** to Bifurcate
Review into Two Briefs
Separate Issues, **Motion** for
Accommodation & **Motion**
Appointment of Legal
Representation

COMES NOW the Defendant, Petitioner, Rosemary Kamb, acting Pro Se, requesting this Court to allow her motion for an extension of time of 90 days to file two briefs¹. One on the issues arising from the operation of the Washington State Correction Center’s mailroom at Purdy; and one for the issues arising from the the underlying case, including, but not limited to, the conflict of interest the Washington State Bar Association caused by refusing to comply with subpoenas issued to its member employees regarding entrapment and vindictive prosecution, which denied the defendant the right of trial confrontation, and subsequently caused the Alford plea to be entered; in addition the WSBA’s response to subpoena so intimidated defendant’s attorney he would not filed defense requested motions to compel².

¹ Or, alternatively, permission to file an over-length brief.

² Tom Seguire, Ms. Kamb’s attorney, was told by WSBA representatives that, “[i]t was in no one’s best interest” to pursue motions to compel the WSBA after it refused to comply with subpoenas. Then Mr. Seguire changed both his case strategy and his demeanor towards Ms. Kamb. When she requested that he file motions to compel Mr. Seguire told Ms. Kamb he would not file motions to compel the WSBA because “[i]t was in no one’s best interest” to pursue the WSBA, although she believed it was her right.

Ms. Kamb has been in transition since being released November 30, 2016 and has not been able to recover all of the documents that she had mailed out of the WCCW mailroom. Including boxes addressed as legal mail. Her ability to recover the documents is integral to her ability to coherently write any brief in a succinct manner, and to the best of her ability.

Further, Ms. Kamb has been acknowledged to be a disabled person by the Social Security Administration, the WSBA, and two insurance companies. The documentation for this disabling condition are a part of the court record and may be found at Defense Exhibits # 42 identified as "Certificate of Disability," #54 "Disability Progress Report," #61 "Notice from Social Security Administration," #62 "Mass Mutual Letter," and #65 "Washington State Bar Association documents." As well as the testimony from Dr. J. Cohen, Dr. J. Hansom, Dr. K. Hoyt, as well as other documents not here listed.

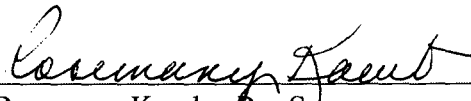
During the entire time of her incarceration Ms. Kamb was not treated for her disabling disorders, in fact, all medications Ms. Kamb brought with her were taken from her. No treatment was given. Ms. Kamb's disability was exacerbated by being incarcerated, without treatment of any kind.

Ms. Kamb has few resources and has moved into a community housing shelter since her release, November 30, 2016, with better but very limited access to what she requires to complete the briefs outlined above. She has been unable to access much of the information she had believed WCCW mailed out prior to her going to work release on August 30, 2016. Although WCCW failed to mail out the documents, it was picked up and most of the information has been located at this point, but is not yet in Ms. Kamb's possession.

Further, Ms. Kamb is in the process of getting the medical attention that has been denied her since incarceration³. Getting the insurance paperwork in order to have those needed appointments and then the prescriptions that would benefit her current conditions so that she is better able to cope with the anxiety and stress of the on-going legal representation since her requests for a court appointed lawyer have not, to date, been granted by the court.

For the reasons stated above, the petitioner moves, and requests this court to allow a continuance for 90 days to file her petition and to file two separate briefs as indicated in paragraph one above, as an accommodation making reasonable modifications in policies, practices, and procedures to access the court; and further as to unrepresented parties to the representation by counsel, as appropriate or necessary in accordance with the American with Disabilities Act of 1990 (42 U.S.C. 12101 et seq and the Washington State Law Against Discrimination RCW 49.60 et eq.

Dated this 28th of December, 2016.



Rosemary Kamb - Pro Se

c/o Jubilee Women's Center
620 18th Avenue East
Seattle, Washington 98112

³ Ms Kamb has an appointment on Tuesday, January 10th at 2:00pm with her primary care physician Janet Hansom, M.D. practicing with NorthCascade Family Physicians.

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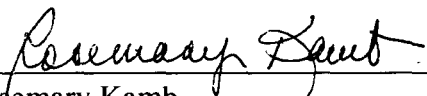
State of Washington)	
Plaintiff,)	No. 93803-2
)	
v.)	Declaration of Mailing
)	via First Class Mail
Rosemary Kamb)	
Defendant)	
)	
)	
)	

I certify under penalty of perjury under the laws of the state of Washington that on the 20 day of December 2016, I delivered via First Class Mail, postage prepaid, a copy of the enclosed Motion for Extension of Time to File Brief, Motion to Bifurcate Review into Two Briefs, Motion for Accommodation & Motion for Appointment of Legal Representation, to the parties listed below, at their addresses of record on the date listed above.

Rosemary Kaholokula, Prosecutor
Skagit County Prosecutor's Office
Courthouse Annex
605 South Third Street
Mount Vernon, WA 98273

Casey Grannis
Nielsen Broman & Koch PLLC
1908 East Madison Street
Seattle, Washington 98122
-2842

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct and that this declaration was executed in Seattle, WA on the date above.



Rosemary Kamb