

THE SUPREME COURT
OF THE STATE OF WASHINGTON

ANGELA K. SCOUTTEN)	
)	
Appellant,)	
)	No. 93873-3
v.)	COA 48027-1-II
)	
)	RESPONDENT'S
MICHAEL J. SCOUTTEN)	MOTION TO
)	EXTEND TIME
Respondent.)	
)	

1. IDENTITY OF MOVING PARTY

Respondent Michael J. Scoutten asks for the relief designated in part 2.

2. STATEMENT OF THE RELIEF SOUGHT

Respondent seeks an order extending time to allow counsel John A. Miller one day additional time to file his Answer.

3. FACTS RELEVANT TO MOTION

On Tuesday, October 25, 2016, the Court of Appeals notified both parties of its decision by way of an Unpublished Opinion. On December 6, 2016, my office received an e-mail from the Supreme Court of Washington informing us that Ms. Schreiner had filed a Petition for Review and a Motion for a one-day extension of time on December 1, 2016. John A. Miller, counsel for Respondent was in Canada on holiday from Friday, December 23, 2016 until Tuesday,

January 3, 2017. John A. Miller was also sick for two weeks over the holidays and filed the Response one day late on January 6, 2017 upon returning to his office.

4. Grounds for Relief and Argument

Pursuant to RAP 18.8(a), this Court may, upon Motion, extend the time in which Respondent has to file his response brief in order to serve the ends of justice. There is no urgency to the issues at hand and it would be an injustice not to allow Respondent an extension of one day in order for counsel to address the Petition for Review.

Respectfully submitted,



John A. Miller, WSBA #5741
Attorney for Respondent
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CERTIFICATE OF SERVICE

I, Lennette N. Natucci, certify as follows:

I am over the age of 18, a resident of Pierce County, and not a party to the above action. On the 2nd day of February, 2017, I caused to be filed and served true and correct copies of the above Motion to Extend Time and this Certificate of Service; on all parties or their counsel of record, as follows:

Via E-service and Certified U.S. Mail


Angela Schreiner
5105 Grand Loop Way, #604
Tacoma, WA 98407
angiekschreiner@gmail.com

Original E-filed with:

Washington State Supreme Court
Clerk's Office
415 12th Street West
Olympia, WA 98504-0929
Supreme@courts.wa.gov

I certify under penalty of perjury under the laws of the State of Washington that the above information is true and correct.

Dated this 2nd day of February, 2017 at Fircrest, WA.



Lennette N. Natucci, Paralegal