

THE SUPREME COURT

State of Washington

LONNIE RAY TRAYLOR)
Petitioner) CASE NO. 94105-0
V) MOTION FOR ORAL
) ARGUMENT
MOST WORSHIPFUL PRINCE)
HALL GRAND LODGE F.A.M.)
WASHINGTON & JURSDICTION)
AND MOST WORSHIPFUL GRAND)
MASTER GREGORY D. WRAGGS, SR)
Respondents)
_____)

I. IDENTITY OF MOVING PARTY AND RELIEF REQUESTED

The undersigned Petitioner of record certifies that the following listed persons and entities as described in Rule 17.5 and Rule 18.14 have an interest in the outcome of this case.

These representations are made in order that the judges of this court may evaluate possible disqualification or recusal.

II. STATEMENT REGARDING ORAL ARGUMENT

The conspiracy forming the basis of this lawsuit is factually intensive, and Petitioner respectfully suggests that the Court would

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4 benefit from hearing Petitioner explain certain details that may shed
5 further light upon the evidence presented at trial.

6 Petitioner seeks a reversal of the trial court based upon the
7 application of the facts in this case to the law in addition to legal
8 errors committed by the trial court, and it is an understanding of the
9 nuances in the facts of this matter that oral argument would benefit.
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11 Petitioner Lonnie Ray Traylor, requests the relief designated in
12 part V.
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14 III. STATEMENT OF RELIEF SOUGHT

15 Petitioner requests permission to Motion to Modify Case Setting
16 and Hold Oral Argument.
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18 IV. GROUND FOR RELIEF AND ARGUMENT

19 Pursuant to RAP 10. 1(H), Petitioner hereby adopts the
20 Motion to Modify Case Setting and Hold Oral Argument filed by
21 Petitioner Lonnie Ray Traylor.
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23 V. FACTS RELEVANT TO MOTION

24 The facts are contained in the Declaration of Petitioner and are
25 incorporated herein.
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On February 9, 2017, the parties received a letter from the Court clerk stating that this petition would be reviewed without oral argument.

Petitioner Lonnie Ray Traylor now moves to modify that decision.

For reasons this petition should be set for oral argument.

1. This petition presents a question of first impression:

The Appellate Court erred in determining if the Grand Lodge has probable cause of accusing Mr. Traylor of theft, because they had no real basis because no formal charges was ever filed against Mr. Traylor from the Church, Private Citizen or other organizations.

The Supreme Court should accept Petitioner request for Oral Argument and hold that the Grand Lodge have discriminated against Petitioner and lacked probable cause to accused Petitioner for evidence of a crime that he have never been formally charged.

This significant question of constitutional law is of substantial public and person interest and should be determined by the Supreme Court. RAP 13. 4(b)(3) and(4).

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2. Request for Oral Argument be granted because the Appellate Court err in their opinion and not consider that the Trial Court Never Demanded or compel Respondents to provided requested discovery evidence to prove the allegation that he was guilty of theft that Petitioner never have been officially charged from any of the alleged entities in question?

3. Request for Oral Argument should be granted because the Appellate Court err in holding in their opinion by granting Respondent Summary Judgement after Judge Chuschcoff who, instructed/advised Petitioner to schedule a time to go to Respondent Counsel office to determine what evidence they had and to report back to him his findings which show no audio of Petitioner which was requested was not made available for Petitioner to prove his innocence.

4. Request for Oral Argument should be granted because the Appellate Court err in holding in their opinion in not remanding Petitioner case back to trial court because they failed to consider the Declarations from Rev. Gregory Christopher and others that in open testimony it will show Petitioner is innocence of allege theft which he has been accused.

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5. Request for Oral Argument should be granted because the Appellate Court err in holding in their opinion in not remanding Petitioner case back to trial court because Respondent has never provided documented proof of what constituted un-masonic conduct. All allege charges of Petitioner case have been based on verbal allegation.

6. Request for Oral Argument should be granted because the Appellate Court err in holding in their opinion in not remanding Petitioner case back to trial court because of Under the Fourteenth Amendment, due process requires the opportunity to be heard “at a meaningful time and in a meaningful manner and the Grand Lodge never provided that opportunity to Petitioner and neither the court in Not Sanctioning the Respondents for not complying to Washington Court Rules.

7. Request for Oral Argument should be granted because the Appellate Court err in holding in their opinion and not consider the Trial Court violated Petitioner Due Process when they allowed The Respondent to respond to Petitioner claim 74days after Petitioner file his claim.

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9. Request for Oral Argument should be granted because the Appellate Court err in holding in their opinion and not consider the Trial Court “NEVER” Sanction Respondent Counsel James Fowler” For filing a “Bogus” Order in the trial court to dismiss the case when the Judge had ruled otherwise. This appear the be a serious crime!

10. Request for Oral Argument Review should be granted because the Appellate Court err in holding in their opinion rendered by the court of appeals and it panel appear not to give consideration to various claims to the dissatisfaction with the trial court decision to the disciplinary procedures used to decide his suspension and discriminated against him in violating his due process being accused of theft without considering all facts.

Petition to Supreme Court 17-19 Before deciding so significant a question, this Court should have the opportunity to have any questions or concerns answered at oral argument.

The case involves a novel legal question, everyone charged with a penal offense has the right to be presumed innocent until proved guilty according to law in a public trial at which he has had all the guarantees necessary for his defense.

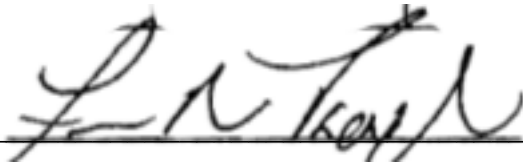
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Petitioner respectfully request the court to consider, how can
Petitioner defend himself when he has never been officially charge with a
Crime and neither have their been any official document proof of allege
Allegation made against him.

VI. CONCLUSION

For the foregoing reasons, Petitioner asks the Supreme Court to set
this matter for oral argument.

RESPECTFULLY SUBMITTED this 4th day of MARCH 2017

By: 

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THE SUPREME COURT
State of Washington

LONNIE RAY TRAYLOR

Petitioner

v

Supreme Court No. 94105-0

Court of Appeal Case No. 48322-0-II

**DECLARATION OF
DOCUMENT FILING AND SERVICE**

**MOST WORSHIPFUL PRINCE HALL GRAND
LODGE F.A.M. WASHINGTON & JURISDICTION
and MOST WORSHIPFUL GRAND MASTER
GREGORY D. WRAGGS, SR.**

Respondents

DECLARATION OF DOCUMENT FILING AND SERVICE

I, LONNIE RAY TRAYLOR , DECLARE THAT ON THE **4TH DAY OF MARCH 2017**, WE, CAUSED THE ORIGINAL **MOTION FOR ORAL ARGUMENT** TO BE FILED IN THE SUPREME COURT AND A TRUE COPY OF THE SAME TO BE SERVED ON THE FOLLOWING IN THE MANNER INDICATED BELOW:

<input checked="" type="checkbox"/>	JAMES C. FOWLER, WSBA # 15560	<input type="checkbox"/>	U.S. MAIL
	1201 PACIFIC AVE STE 1900	<input checked="" type="checkbox"/>	HAND DELIVERED
	TACOMA, WA 98402	<input type="checkbox"/>	AGREED E-SERVICE VIA COA PORTAL

SIGNED IN LACEY, WASHINGTON THIS 4TH DAY OF MARCH 2017