

IN THE SUPREME COURT
OF THE STATE OF WASHINGTON

STATE OF WASHINGTON
Respondent,

vs.

MARIA MANZO
Petitioner/Appellant.

MOTION AND DECLARATION FOR EXTENSION OF TIME
TO FILE PETITION FOR REVIEW

Brent A. De Young
WSBA #27935
De Young Law Office
P.O. Box 1668
Moses Lake, WA 98837
(509) 764-4333 tel
(888) 867-1784 fax
deyounglaw1@gmail.com

Attorney for Petitioner

1. Identity of Moving Party

MARIA MANZO, Petitioner, by and through her counsel of record, asks for the relief designated in Part 2.

2. Statement of Relief Sought

To extend the due date of Petitioner's Petition for Review to the date and time of receipt by the Court.

3. Facts Relevant to Motion

Counsel for the Appellant had completed Ms. Manzo's Petition for Review prior to leaving the office on the morning of June 8, 2017 for a day of client meetings out of the office.

Counsel's paralegal, Shirley Diamond, had only recently returned to work after a lengthy hospitalization following open-heart surgery.

Ms. Diamond encountered major technological difficulties while trying to file the Petition for Review on the Washington Court web portal. This resulted in the document being filed after the 4:30 p.m. deadline on June 8, 2017.

For these reasons, an extension of time to file Ms. Manzo's Petition for Review to date and time of receipt is within the interests of justice and will not prejudice either party.

Respectfully submitted this 26th day of June, 2017.

s/ Brent A. De Young
WSBA #27935
De Young Law Office
P.O. Box 1668
Moses Lake, WA 98837
(509) 764-4333 tel
(888) 867-1784 fax
deyounglaw1@gmail.com

DECLARATION OF SHIRLEY DIAMOND

1. I am Shirley Diamond, paralegal at De Young Law Office.
2. I began trying to file the Petition for Review after lunch on June 8, 2017.
3. My computer was unable to connect with any internet web sites.
4. I waited and made numerous other attempts to connect with the Court web portal throughout the afternoon.
5. We had been experiencing occasional internet outages from our provider during the previous week.
6. I thought that I might be able to file the Petition for Review by fax.
7. Unfortunately, due to recent open-heart surgery, I was unable to physically lift our old fax machine out of storage in order to be able to connect the machine to a phone line to fax file the Petition for Review.
8. Mr. De Young was out of the office on June 8, 2017.
9. I was finally able to contact Mr. De Young after 4:00 p.m. to advise him of the difficulty I was having connecting to the internet and the web portal.
10. Mr. De Young told me to restart my computer, our office server computer, and the router. He walked me through the procedure.
11. I was able to connect to the internet and the Court web portal after restarting the computers. However, it was 5:00 p.m. by the time I successfully filed the Petition for Review.

I swear, under penalty of perjury under the laws of the State of Washington, that the foregoing is true and correct to the best of my knowledge.

Signed this 26th day of June, 2017 at Moses Lake, Washington.

s/ Shirley Diamond
Paralegal, De Young Law Office
P.O. Box 1668
Moses Lake, WA 98837
509-764-4333
deyounglaw1@gmail.com

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

STATE OF WASHINGTON,
Plaintiff/Respondent,

vs.

MARIA MANZO,
Petitioner/Appellant.

Supreme Court No. 94630-2
Court of Appeals No. 33432-5-III
Grant Superior No. 03-1-00956-6

MOTION AND DECLARATION FOR
EXTENSION OF TIME TO FILE PETITION
FOR REVIEW

CERTIFICATE OF SERVICE

I certify that on this 26th day of June, 2017, I caused to be sent electronically or as otherwise indicated, a copy MOTION AND DECLARATION FOR EXTENSION OF TIME TO FILE PETITION FOR REVIEW to:

Grant County Prosecuting Attorney
P.O. Box 37
Ephrata, WA 98823
kburns@grantcountywa.gov

s/ Brent A. De Young
WSBA #27935
P.O. Box 1668
Moses Lake, WA 98837
(509) 764-4333 tel
(888) 867-1784 fax
deyounglaw1@gmail.com
Attorney for Petitioner

DE YOUNG LAW OFFICE

June 26, 2017 - 2:42 PM

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: 94630-2
Appellate Court Case Title: State of Washington v. Maria I. Manzo
Superior Court Case Number: 03-1-00956-6

The following documents have been uploaded:

- 946302_Motion_20170626143820SC082891_9524.pdf
This File Contains:
Motion 1 - Extend Time to File
The Original File Name was 2017-06-26 Manzo Maria - Motion and Declaration for Extension of Time to File.pdf

A copy of the uploaded files will be sent to:

- deyounglaw1@gmail.com
- gdano@grantcountywa.gov
- kwmathews@grantcountywa.gov

Comments:

Sender Name: Shirley Diamond - Email: shadessharp@yahoo.com
Address:
PO BOX 1668
MOSES LAKE, WA, 98837-0258
Phone: 509-764-4333

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