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SUPREME COURT
STATE OF WASHINGTON

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

(Division III Case Number 349888)

T.L.M, Respondent

v.

Kerry Milliken, Appellant

**Motion to Consolidate Division III Case Cumbers
34988-8-III and 35052-5-III**

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I. Party Moving for Consolidation of Appeals: Kerry Milliken

Kerry Milliken -- appellant in Division III case numbers 34988-8-III and 35052-5-III -- appears to ask the State Supreme Court to consolidate the two Petitions for Review

II. Relief Sought: Consolidation of CHINS Cases under RAP 3.3(b)

Ms. Milliken asks the Supreme Court to consolidate the two CHINS petition requests for review under RAP 3.3(b).

III. Facts Relevant to Motion: Same Parties and Same Issues

The two CHINS petitions and orders at issue involve the same parties: TLM, juvenile petitioner, and Kerry Milliken, mother of TLM, as respondent. The two CHINS petitions raise the same issues of the statutory insufficiency of the pleadings and of the facts, and raise the same request that the constitutional decisions of Washington State be applied to CHINS, and seek a determination that strict scrutiny be required of such schemes which so intrude upon parental rights. The filed pleadings are incorporated herein.

IV. Basis of Relief: Same Parties and Same Issues and RAP 3.3 (b)

RAP 3.3(b) provides for consolidation of cases on appeal “if consolidation would save time and expense and provide a fair review of the cases.” Such a motion is made by Kerry Milliken under RAP 17, as,

on the court file incorporated herein, fair review and judicial economy would be served by consolidation.

NOTE: As Ms. Milliken is indigent, she has not been charged any legal fees for the entire appeal process; however, she is paying costs, and consolidation would reduce the cost burden to her.

The court is asked to decide the consolidation summarily, without oral argument.

Consolidated review is requested.

Respectfully submitted on 6/20/17,



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