

STATE OF WASHINGTON
SUPREME COURT

STATE OF WASHINGTON,
Respondent,

vs.

QIUORDAI TAYLOR,
Petitioner.

No. 95554-9

MOTION FOR EXTENSION OF
TIME TO FILE PETITION FOR
REVIEW

I. Identity of Moving Party

Petitioner, Qiuordai Taylor, by and through his counsel of record, Edward Penoyar, moves the court for the relief requested in Paragraph II.

II. Relief Requested

Petitioner requests an extension of time to submit the Petition for Review that was due February 22, 2018 and filed February 26, 2018.

III. Facts Relevant to Motion

The factual reasons for extension of time sought by the Appellant is set forth in the subjoined Declaration of Edward Penoyar.

IV. Grounds for Relief and Argument

RAP 18.8 authorizes the appellate courts to enlarge the time within which an act must be done in a particular case. As set forth in the Declaration below, there is good cause for extending the filing deadline of this Petitioner's Petition for Review.

V. Conclusion

Counsel respectfully requests that the court grant Petitioner's motion for an extension of time to file the Petition for Review.

DATED this 1st day of March, 2018.

/s/ Edward Penoyar

Edward Penoyar, WSBA #42919

Counsel for Appellant

edwardpenoyar@gmail.com

PO Box 425

South Bend, WA 98586

(360) 875-5321

(360) 875-5548 Fax

DECLARATION OF EDWARD PENOYAR

EDWARD PENOYAR, pursuant to RCW 9A.72.085, hereby declares as follows:

1. Pursuant to RAP 13.4(a), a petition for review should be received within 30 days of a decision terminating review being filed. The Petition was due February 22, 2018.

2. Qiuordai Taylor's Petition for Review in this consolidated case was submitted two business days late because I was awaiting a critical client communication from Mr. Taylor, who is in prison. Contacting incarcerated clients can take time. Offenders are only allowed to call at certain times. Unfortunately, when Mr. Taylor was able to call I was out of the office on other court matters. I finally received written communication from my client that allowed me to proceed with the filing of the Petition, unfortunately just after it was due.

3. In the interest of justice, counsel respectfully requests that this Court accept the late filing of the Petition for Review that has been filed on behalf of Qiuordai Taylor. This extension will not prejudice Petitioner Wilson or the Respondent in any way and is requested in good faith.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Signed this 1st day of March, 2018, at South Bend, Washington.

/s/ Edward Penoyar
Edward Penoyar, WSBA #42919
Counsel for Appellant
edwardpenoyar@gmail.com
PO Box 425
South Bend, WA 98586
(360) 875-5321

Certificate of Service

On the date below, I e-filed and served the foregoing Motion for Extension of Time to File Brief directed to:

Michelle Hyer
Pierce County Prosecutor's Office
pcpatcecf@co.pierce.wa.us

Catherine E. Glinski
Glinski Law Firm PLLC
cathyglinski@wavecable.com

I declare under penalty of perjury of the laws of the state of Washington that the foregoing is true and correct.

Dated March 1, 2018, South Bend, Washington.

/s/ Tamron Clevenger _____
Tamron Clevenger, Paralegal to
EDWARD PENOYAR
Attorney at Law
PO Box 425
South Bend, WA 98586
(360) 875-5321

PENoyer LAW OFFICES

March 01, 2018 - 1:19 PM

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: 95554-9
Appellate Court Case Title: State of Washington v. Qiuordai Lewis Taylor and Duprea Romon Wilson
Superior Court Case Number: 14-1-04698-9

The following documents have been uploaded:

- 955549_Motion_20180301131857SC755844_7852.pdf
This File Contains:
Motion 1 - Extend Time to File
The Original File Name was Motion for Extension to File.pdf

A copy of the uploaded files will be sent to:

- PCpatcecf@co.pierce.wa.us
- glinskilaw@wavecable.com
- penoyarlawyer@gmail.com

Comments:

PLEASE DISREGARD THE PRIOR FILING, THE WRONG PDF WAS UPLOADED BY MISTAKE. THIS IS THE COMPLETE MOTION, DECLARATION AND DECLARATION OF SERVICE

Sender Name: Tamron Clevenger - Email: tamron_penoyarlaw@comcast.net

Filing on Behalf of: Edward Harry Penoyar - Email: edwardpenoyar@gmail.com (Alternate Email:)

Address:
PO Box 425
South Bend, WA, 98586
Phone: (360) 875-5321

Note: The Filing Id is 20180301131857SC755844