

FILED
SUPREME COURT
STATE OF WASHINGTON
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BY SUSAN L. CARLSON
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Washington State Supreme Court No. 99707-1
Division III Court of Appeals No. 374963

THE SUPREME COURT
OF THE STATE OF WASHINGTON

In Re:

MARY CHINEYE EZENWA,
Petitioner,

v.

ALAN PHILIP CARLIN,
Vulnerable Adult.

REPLY TO PETITIONER'S MOTION TO AMEND
([treated as an answer to motion to amend](#))

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 A. The Supreme Court of the State of Washington should deny
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 B. Additional responses to Issues Raised by Petitioner are
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I. ISSUES PRESENTED FOR REVIEW

- A. Should the Supreme Court of the State of Washington grant Petitioner's Motion to Amend Petition for Review?**

- B. Responses to the remainder of the new arguments contained in Petitioner's Amended Petition for Review are reserved in the event the court accepts this case for review or grants leave to amend.**

I. STATEMENT OF ISSUES

Petitioner Mary C. Ezenwa filed and served a noncompliant Petition for Discretionary Review on April 1, 2021. This Court, through its clerk, rejected said brief and directed Petitioner to revise and resubmit by May 11, 2021. See letter from Erin L. Lennon, Supreme Deputy Court Clerk dated April 27, 2021. Petitioner then refiled on May 11, 2021 and served an updated and substantially changed brief for which Respondent filed an Answer on June 3, 2021. Petitioner now files and serves not only a Motion for Leave to Amend Petition for Review on June 17, 2021 but also filed therewith her second noncompliant Amended Petition for Review citing entirely new arguments which are again not supported by the record.

II. LAW AND ARGUMENT

A. **The Supreme Court of the State of Washington should deny Petitioner's Motion to Amend the Petition for Review.**

Ms. Ezenwa's appeal was deemed frivolous. *See* Court of Appeals decision on file herein. Ms. Ezenwa continues to relitigate this matter and continues to cause Respondent to incur additional significant legal fees in responding to her constantly changing and noncompliant petitions and briefs. This Court should not permit her

to use the legal system to annoy, harass, and cause unjust fees to be charged to the protected party in this protection order or the petitioner of a vulnerable adult protection order, Peter Carlin, who is the Respondent in this appeal. Therefore, this Court should deny Petitioner Mary C. Ezenwa's Motion to Amend Petition for Review and reject the purported new second Amended Petition for Review.

- B. Responses to the remainder of the new arguments of Mary C. Ezenwa are reserved pending a decision by the Supreme Court on acceptance of this case for review or grants permission to file an amended petition for review.**

Response Reserved.

III. CONCLUSION

This court should deny Ms. Ezenwa's Motion for Leave to File an Amended Petition for Review.

RESPECTFULLY SUBMITTED this 29th day of June 2021.



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CERTIFICATE OF SERVICE

I, DIANNA J. EVANS, hereby certify that I served Mary C. Ezenwa, appellant pro se, via USPS regular mail, at the address indicated below, a true and correct copy of this Reply to Petitioner's Motion to Amend, on file herein:

Mary C. Ezenwa
711 Commerce Way #13
Libby, MT 59923

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

DATED this 29th day of June 2021, at Spokane, Washington.



DIANNA J. EVANS, WSBA #45702

LAW OFFICE OF RICHARD W. PEREDNIA

June 29, 2021 - 1:13 PM

Transmittal Information

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