

FILED  
Court of Appeals  
Division II  
State of Washington  
11/16/2021 12:24 PM

FILED  
SUPREME COURT  
STATE OF WASHINGTON  
11/16/2021  
BY ERIN L. LENNON  
CLERK

Supreme Court No. 100379-0  
Court of Appeals Div. II No. 51642-0-II

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SUPREME COURT  
OF THE STATE OF WASHINGTON

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Tatyana Mason,

Appellant,

v.

John A. Mason and Laurie Robertson,

Respondents.

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MOTION FOR AN EXTENSION OF TIME TO FILE  
PETITION FOR REVIEW

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By:

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### 1. IDENTITY OF MOVING PARTY

Respondent, Laurie Robertson, (“Laurie”), by and through undersigned counsel, moves this Court for the relief stated in paragraph two.

### 2. STATEMENT OF RELIEF SOUGHT

Laurie respectfully requests an extension of time until Monday, December 20, 2021, to file its Petition for Review.

### 3. FACTS RELEVANT TO MOTION

A published decision was filed on October 19, 2021. A petition for review is currently due November 18, 2021. The published opinion is over 50 pages. The decision creates new law and greatly impacts all attorneys in Washington State. It substantially reduces attorney immunity from tort actions brought by opposing parties, allowing such suits even on bare allegations such as “conspiracy.” The decision will create a chilling effect on attorney representation as a whole. It is directly contrary to the Supreme Court’s long-held public policies supporting attorney immunity. The published decision cites no evidence presented to the trial court by Appellant of this particular attorney, Laurie, representing her client with any ulterior motive when filing and concluding a commonplace family law modification action. Yet, if this Court does not grant review, Laurie will now endure an expensive trial regarding a tort against her so frivolous that the trial court imposed CR 11 sanctions upon Appellant for bringing it. The Court will

benefit from quality briefing and citation to decide whether to grant review. There is no time-sensitive aspect to this Petition for Review.

Undersigned has returned to work after taking time off caring for a newborn and a wife with complications from surgery. He and his paralegal are catching up on work after a prolonged absence. Undersigned handles a large amount landlord-tenant cases, which are staggering in number at this point in time. These (often emergency type) cases dealing with contentious living arrangements, crime on property, domestic violence, and eviction proceedings, require immediate attention. Many landlord attorneys simply no longer practice this area of law because of its new, extreme, complexity. Undersigned is doing his best to help alleviate the caseload on trial courts, including providing free training for attorneys at CLEs. Undersigned has a opening brief in another matter due in December, and for the above reasons he respectfully requests about a thirty-day extension of time to file his client's petition for review.

#### 4. GROUNDS FOR RELIEF

Under RAP 18.8, this Court's Commissioner or Clerk may extend the time in which anything must be done regarding an appeal as well as to promote justice.

Here, an approximate 30-day extension of time, is reasonable and warranted under the circumstances. Laurie respectfully requests this

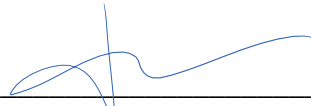
extension of time.

5. CONCLUSION

For the reasons stated above, this Court should grant Laurie's Motion for an Extension of Time to File her Petition for Review.

Respectfully submitted this 16th day of November, 2021,

HARBOR APPEALS AND LAW, PLLC



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Drew Mazzeo WSBA No. 46506  
Attorney for Laurie Robertson

# HARBOR APPEALS AND LAW, PLLC

November 16, 2021 - 12:24 PM

## Transmittal Information

**Filed with Court:** Court of Appeals Division II  
**Appellate Court Case Number:** 51642-0  
**Appellate Court Case Title:** Tatyana Mason, Appellant v John Mason and Laurie Robertson, Respondents  
**Superior Court Case Number:** 17-2-01121-2

### The following documents have been uploaded:

- 516420\_Motion\_20211116122410D2972357\_0719.pdf  
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Motion 1 - Extend Time to File  
*The Original File Name was ROBERTSON LAURIE supreme court motion for extension of time to file petition for review FINAL to be FILED.pdf*

### A copy of the uploaded files will be sent to:

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- matt@nwirp.org
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- robm@nwjustice.org
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### Comments:

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