RECEIVED SUPREME COURT STATE OF WASHINGTON Apr 01, 2014, 9:46 am BY RONALD R. CARPENTER **CLERK** 1 2 3 4 5 6 7 SUPREME COURT 8 OF THE STATE OF WASHINGTON 9 JOYCE KELLEY, individually; 10 NO. 90054-0 Plaintiff, 11 V. MOTION FOR EXTENSION OF TIME TO FILE JOINDER WITH PETITION 12 PIERCE COUNTY, a county corporation and MARK SKAGREN and "JANE DOE" FOR REVIEW 13 SKAGREN, and the marital community composed thereof; 14 Defendants. 15 I. IDENTITY OF MOVING PARTY 16 Mark Shagren (Skagren) and "Jane Doe" Shagren (Skagren), Petitioners, ask for 17 the relief designated in section II below. 18 II. STATEMENT OF RELIEF SOUGHT 19 Petitioners Shagren request an extension of time to file their Joinder with Pierce 20 County's Petition for Review, filed with the Court of Appeals Division II on March 24, 21 2014. 22 III. FACTS RELEVANT TO MOTION. 23 Petitioner Pierce County filed its Petition for Review on March 24, 2014. Petitioners Shagren filed their Joinder in Pierce County's Petition for Review on March 27, 24 2014. 25 /// 26 MOTION FOR EXTENSION OF TIME TO FILE JOINDER WITH PETITION

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## IV. GROUNDS FOR RELIEF

RAP 17.1(a) authorizes a party to seek relief from the Court, other than a decision of the case on the merits, by motion. Under RAP 18.8 (b) an extension of time may be granted within which a party may file a Petition for Review. Petitioner Pierce County has timely filed its Petition for Review, and the parties will not be prejudiced in allowing a short extension of time for Petitioners Shagren to file a Joinder in Pierce County's Petition for Review.

## V. CONCLUSION

Petitioners Shagren respectfully request the Court grant an extension of time beyond 30 days in which to file their Joinder in Pierce County's Petition for Review.

DATED this 3/ day of March, 2014.

CHRISTOPHER KEAY, WSBA #1314

Attorney for Petitioners Shagren