

ORIGINAL

FILED
COURT OF APPEALS
DIVISION III
STATE OF WASHINGTON
93678-1

**COURT OF APPEALS DIVISION III
OF THE STATE OF WASHINGTON**

FILED
E OCT 18 2016
WASHINGTON STATE
SUPREME COURT

STATE OF WASHINGTON, DSHS)	
Respondent)	Cause No. 327582
)	Cause No. 13-2048943
v.)	
)	MOTION FOR EXTENSION
HOLLY SNYDER)	OF TIME TO SUBMIT
Petitioner)	PETITION FOR REVIEW
_____)	

I. IDENTITY OF MOVING PARTY

HOLLY SNYDER, Appellant, through counsel, PHELPS & ASSOCIATES, PS, respectfully requests the relief designated in Part II below.

II. STATEMENT OF RELIEF SOUGHT

Counsel for Appellant requests an extension of time for filing the Petition for Review.

III. FACTS RELEVANT TO MOTION

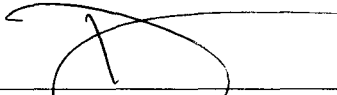
The Petition for Review was due on September 29, 2016 pursuant to RAP 13.3(a). The Petitioner's counsel erred and submitted a Notice of Discretionary Review on September 29, 2016. On October 3, 2016, counsel called the Supreme Court Clerk to ensure it was filed correctly and was told it was submitted

correctly. When counsel discovered the error they worked diligently to submit the proper briefing.

IV. GROUNDS FOR RELIEF

Douglas D. Phelps, attorney for appellant, is requesting an extension to October 12, 2016.

Submitted this 12th day of October, 2016.



Douglas D. Phelps, WSBA #22620
Attorney for Appellant