

1
2 COURT OF APPEALS DIVISION I OF THE STATE OF WASHINGTON

3
4 TAMARA ZAITSEV,

5 Appellant

6 vs.

7 SHAWN KELLER, DDS (SMILES BY DESIGN),

8 Respondent

Court of Appeals Case No. 74626-0

MOTION FOR EXTENSION OF TIME TO FILE
MOTION FOR DISCRETIONARY REVIEW

9 King Co. Superior Court
10 Case No.: 15-2-11270-8 SEA

FILED
COURT OF APPEALS DIV 1
STATE OF WASHINGTON
2017 SEP 20 PM 2:48

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14 Here comes the Appellant, Tamara Zaitsev, per se, and respectfully pleads this court for an
15 extension of time of 90 days to file the PETITION FOR DISCRETIONARY REVIEW due to:

- 16
17 1. **Medical problems.** Due to constant and continuous pain and dependence on pain
18 medications, Appellant is unable to conduct normal daily operations, hence unable to keep
19 up with the litigation pace (See enclosed EXHIBIT 1 – PHARMACY STATEMENT OF
20 MEDS). Appellant is awaiting an appointment with her physician on October 6, 2017 to
21 obtain a detailed statement of her current condition in case this court demands additional
22 supporting documentation.
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24 2. **Inability to find legal representation/attorney.** Appellant has made numerous attempts
25 over the last couple of years to find an attorney after two of her attorneys have neglected
26 her case, with no success. Appellant now has to consult Pro Bono attorneys to continue
27 pleading her case, which requires waiting time. Pro Bono legal help appointments are
28 only 30 minutes long which is not sufficient to obtain adequate legal advice, so multiple
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MOTION FOR EXTENSION OF TIME TO FILE MOTION FOR DISCRETIONARY REVIEW - 1

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appointments are necessary. Appellant is only allotted one such appointment in an uncertain period of time, sometimes weeks. Her next appointment is scheduled for October 4, 2017, which is within days of the filing deadline for PETITION FOR REVIEW that Appellant is seeking to extend time for, and leaves Appellant very little time to make a sufficient pleading.

- 3. **Inability to speak English and being computer illiterate.** Appellant is 72 years old and is computer and internet illiterate, without any sufficient education, nor the ability to speak or understand English.
- 4. **Indigence.** Appellant's income is less than \$1000/mo. She is unable to pay for professional serviced to help her defend her cause, so she also has to rely on occasional unprofessional help from family and friends who do not possess any sufficient legal education.

DATED this ___20th___ day of September, 2017 at Bellevue, WA.

Zaitsev Tamara
Tamara Zaitsev, Appellant

"EXHIBIT 1"

Medical Expenses

Dates: 03/01/2017 to 09/19/2017

Patient: Zaitsev
Tamara
15409 12th St Ne # G351
Belluevue, WA 98005

DOB: 10/12/1946

Pharmacy: SAFEWAY #27-0490
1645 140TH AVE NE
BELLEVUE
WA 98005

NCPDP: 4928656
Pharmacist: Gopal,
Sundeeep S

Fill Date	Rx#	Tx#	Drug Name	DispQty	U & C Price
3/5/2017 1/0/1	6303746	1721043	Bupropion Hcl Er (Sr) 12hr 100 Mg Tab Sand	60.0	\$ 1.20
3/10/2017 4/0/4	6300074	1722116	Doxepin Hcl 25 Mg Cap Myla	60.0	\$ 1.20
3/13/2017 2/1/0	6307594	1722598	Topiramate 25 Mg Tab Cipl	120.0	\$ 1.20
3/13/2017 0/0/0	2030836	1722628	Hydrocodone-Acetaminophen 5-325 Mg Tab Mall	84.0	\$ 1.12
3/17/2017 12/6/2	6303736	1722682	Lisinopril 20 Mg Tab Sand	60.0	\$ 1.00
3/20/2017 3/0/3	6293232	1723748	Atorvastatin Calcium 80 Mg Tab Apot	90.0	\$ 1.20
3/20/2017 3/1/1	6303738	1723746	Atenolol 25 Mg Tab Sand	90.0	\$ 1.20
3/20/2017 3/0/2	6303742	1723742	Spironolactone 25 Mg Tab Sunp	30.0	\$ 0.50
3/20/2017 12/5/2	6303743	1723743	Levothyroxine Sodium 137 Mcg Tab Sand	30.0	\$ 1.20

Fill Date	Rx#	Tx#	Drug Name	DispQty	U & C Price
RA/RR/RN					
3/20/2017 6/0/2	6303740	1723744	Trazodone Hcl 100 Mg Tab Teva	30 0	\$ 1.00
3/20/2017 3/0/1	6303793	1723745	Metformin Hcl Er 24hr 500 Mg Tab Sunp	180.0	\$ 1.20
4/7/2017 1/0/0	6309199	1727440	Bupropion Hcl Er (Sr) 12hr 100 Mg Tab Sand	60 0	\$ 1.20
4/9/2017 3/2/0	6309198	1727393	Lisinopril 20 Mg Tab Sand	180 0	\$ 1.20
4/11/2017 3/0/0	6309379	1728014	Doxepin Hcl 25 Mg Cap Myla	60 0	\$ 1.20
4/15/2017 1/0/0	6309569	1728576	Fluoxetine Hcl 20 Mg Cap Auro	30 0	\$ 0.50
4/17/2017 6/0/3	6303740	1728737	Trazodone Hcl 100 Mg Tab Teva	30 0	\$ 1.00
4/17/2017 12/5/3	6303743	1728735	Levothyroxine Sodium 137 Mcg Tab Sand	30 0	\$ 1.20
4/17/2017 3/0/3	6303742	1728738	Spirolactone 25 Mg Tab Sunp	30 0	\$ 0.50
4/18/2017 1/0/0	6309690	1728997	Carbidopa-Levodopa 25-100 Mg Tab Sunp	84 0	\$ 1.12
4/21/2017 0/0/0	2031143	1729768	Hydrocodone-Acetaminophen 5-325 Mg Tab Mall	84 0	\$ 1.12

Fill Date	Rx#	Tx#	Drug Name		DispQty	
RA/RR/RN						U & C Price
5/8/2017	6309379	1732531	Doxepin Hcl 25 Mg	Cap Myla	60.0	
3/0/1						\$ 1.20
5/15/2017	6309690	1733631	Carbidopa-Levodopa 25-100 Mg	Tab Sunp	84.0	
1/0/1						\$ 1.12
5/15/2017	6303743	1733667	Levothyroxine Sodium 137 Mcg	Tab Sand	30.0	
12/5/4						\$ 1.20
5/15/2017	6309199	1733670	Bupropion Hcl Er (Sr) 12hr 100 Mg	Tab Sand	60.0	
1/0/1						\$ 1.20
5/15/2017	6309569	1733668	Fluoxetine Hcl 20 Mg	Cap Auro	30.0	
1/0/1						\$ 0.50
5/15/2017	6307594	1733674	Topiramate 25 Mg	Tab Cipl	120.0	
2/1/1						\$ 1.20
5/20/2017	6311560	1734612	Spirolactone 25 Mg	Tab Sunp	30.0	
2/0/0						\$ 0.50
5/22/2017	6303740	1734860	Trazodone Hcl 100 Mg	Tab Teva	30.0	
6/0/4						\$ 1.00
5/23/2017	2031370	1735041	Hydrocodone-Acetaminophen 5-325 Mg	Tab Mall	84.0	
0/0/0						\$ 1.12
6/6/2017	6303738	1737520	Atenolol 25 Mg	Tab Sand	90.0	
3/1/2						\$ 1.20

Fill Date	Rx#	Tx#	Drug Name		DispQty	
RA/RR/RN						U & C Price
6/6/2017 3/2/0	6303741	1737519	Atorvastatin Calcium 80 Mg	Tab Apot	90 0	\$ 1.20
6/6/2017 3/0/2	6303793	1737525	Metformin Hcl Er 24hr 500 Mg	Tab Sunp	130 0	\$ 0 00
6/6/2017 3/0/2	6303793	1737530	Metformin Hcl Er 24hr 500 Mg	Tab Asce	50 0	\$ 1 20
6/7/2017 3/0/2	6309379	1737552	Doxepin Hcl 25 Mg	Cap Myla	60 0	\$ 1 20
6/15/2017 6/0/5	6303740	1739131	Trazodone Hcl 100 Mg	Tab Teva	30 0	\$ 1.00
6/15/2017 12/5/5	6303743	1739132	Levothyroxine Sodium 137 Mcg	Tab Sand	30 0	\$ 1.20
6/15/2017 2/0/1	6311560	1739144	Spirolactone 25 Mg	Tab Sunp	30.0	\$ 0 50
6/15/2017 2/0/0	6313000	1739272	Bupropion Hcl Er (Sr) 12hr 100 Mg	Tab Sand	60 0	\$ 1.20
6/16/2017 12/6/3	6303736	1739369	Lisinopril 20 Mg	Tab Sand	60 0	\$ 1 00
7/5/2017 0/0/0	6314018	1742393	Topiramate 25 Mg	Tab Cipl	56.0	\$ 1.12
7/5/2017 0/0/0	2031705	1742394	Hydrocodone-Acetaminophen 5-325 Mg	Tab Mall	112 0	\$ 1.12

Fill Date	Rx#	Tx#	Drug Name		DispQty	
RA/RR/RN						U & C Price
7/8/2017 3/0/3	6309379	1742840	Doxepin Hcl 25 Mg	Cap Myla	60 0	\$ 1.20
7/9/2017 3/2/1	6309198	1739499	Lisinopril 20 Mg	Tab Sand	180 0	\$ 1.20
7/25/2017 6/0/6	6303740	1745599	Trazodone Hcl 100 Mg	Tab Teva	30 0	\$ 1.00
7/25/2017 2/0/1	6313000	1745598	Bupropion Hcl Er (Sr) 12hr 100 Mg	Tab Sand	60 0	\$ 1.20
7/25/2017 2/0/2	6311560	1745604	Spironolactone 25 Mg	Tab Sunp	30.0	\$ 0.50
7/29/2017 12/5/6	6303743	1746165	Levothyroxine Sodium 137 Mcg	Tab Sand	30 0	\$ 1.20
7/31/2017 2/1/0	6314576	1744155	Doxepin Hcl 25 Mg	Cap Myla	60.0	\$ 1.20
8/4/2017 0/0/0	2031927	1747140	Hydrocodone-Acetaminophen 5-325 Mg	Tab Mall	112 0	\$ 1.12
8/13/2017 3/2/1	6303741	1739137	Atorvastatin Calcium 80 Mg	Tab Gree	90 0	\$ 1.20
8/17/2017 6/5/0	6316121	1748883	Trazodone Hcl 100 Mg	Tab Teva	30.0	\$ 1.00

Fill Date	Rx#	Tx#	Drug Name	DispQty	U & C Price
RA/RR/RN					
8/25/2017 12/5/17	6303743	1750368	Levothyroxine Sodium 137 Mcg Tab Sand	30 0	\$ 1.20
8/25/2017 2/1/11	6314576	1750370	Doxepin Hcl 25 Mg Cap Myla	60 0	\$ 1.20
8/25/2017 2/0/2	6313000	1750369	Bupropion Hcl Er (Sr) 12hr 100 Mg Tab Acta	60 0	\$ 1.20
9/4/2017 2/2/0	6316685	1751763	Spiroinolactone 25 Mg Tab Sunp	30 0	\$ 0 50
9/4/2017 2/2/0	6313001	1751768	Fluoxetine Hcl 20 Mg Cap Auro	30 0	\$ 0 50
9/6/2017 3/0/3	6303793	1752042	Metformin Hcl Er 24hr 500 Mg Tab Sunp	180.0	\$ 59 49

Report Date: 09/19/2017

Total Patient Pay: \$116.95

Attested By:



Registered Pharmacist