

FILED  
SUPREME COURT  
STATE OF WASHINGTON  
4/6/2018 11:00 AM  
BY SUSAN L. CARLSON  
CLERK

Supreme Court No. 95327-9

Court of Appeals No. 50360-3-II

**SUPREME COURT OF THE STATE OF WASHINGTON**

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**In Re the Matter of the Marriage of**

**RALUCA VETRICI,**

**Respondent,**

**v.**

**GRIGORE VETRICI,**

**Petitioner.**

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**PETITIONER'S MOTION TO EXTEND TIME AND AMEND THE  
COMBINED REPLY TO RESPONDENT'S COMBINED ANSWER**

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**Grigore Vetrici, pro se  
307, 935 Marine Drive  
West Vancouver, BC V7T 1A7  
(403) 702-5692**

***MOVING PARTY AND***

This motion to amend the combined reply and extend time is brought by Petitioner Grigore Vetrici.

***REQUESTED RELIEF***

Petitioner respectfully requests to extend time to file the combined reply which was due on March 29, 2018, making it due as of the date of its filing on March 30, 2018. He also requests to amend the combined reply. If necessary, Petitioner also requests to file an over-length motion.

***FACTS RELEVANT TO MOTION***

The filing date for the reply to the motion was set by the court for March 29, 2018. Subsequently, respondent filed a combined answer to the motion and petition. Petitioner then inquired with the Court for the date that a combined reply would be due, which was also set for March 29, 2018. On March 29, 2018, Petitioner emailed notice to the court and the respondent that he would not manage to file before 5 PM. On March 30, after filing the combined reply through the online portal, he emailed the court asking for directions. On April 2, 2018, the Court advised both parties that the combined reply was untimely filed and that it would not be considered unless a motion for extension of time was filed and granted; such motion was to be served and filed by April 6, 2018. Together with the request to extend time, Petitioner now requests to amend the combined

reply, and if necessary, an over-length motion.

RAP 13.4(f) restricts the length of a reply to an answer to a petition for review to 20 pages. The length of a reply to a motion is restricted to 10 pages by RAP 17.4(g)(1).

The amended combined reply is 14 pages.

Petitioner, acting pro se, is trying to enforce his rights under the Washington decree which states that the children “reside with father” after a Canadian court has given the respondent shared custody on the basis of the separation agreement whose termination was memorialized in the decree.

Petitioner is burdened by his limited time, mental and emotional resources. His focus is divided and has been unable to complete the combined reply by the assigned date.

#### ***GROUND FOR RELIEF***

Petitioner is asking the Court to liberally interpret the rules to promote justice and facilitate the decision of the case on the merits per RAP 1.2(a), and to waive or alter under RAP 1.2(c) the provisions of any limiting rules in order to serve the ends of justice.

The amended reply has been edited for informal language and addresses how two principal conflicting authorities previously included apply to the instant case.

Petitioner was provided with filing dates but was left without page limits. Although the filing date for the petition for review was adjusted to that of the motion, it is unclear which page limit should apply.

For the reasons stated above, Petitioner respectfully requests this Court grant the motion to extend time and to amend.

Respectfully submitted this 6<sup>th</sup> day of April, 2018.

s/ Grigore Vetrici  
Petitioner, Pro Se

#### DECLARATION

I, Grigore Vetrici, declare and say:

I am the petitioner in this matter.

I am trying to enforce my rights under the Washington decree of dissolution and restore the parenting time I had with my children. The decree was modified by a Canadian court which enforced the former separation agreement misrepresented by Raluca in that court.

I find it hard to manage the timelines imposed by the court rules due to my slow pace meeting what I understand to be the technical requirements of legal writing and research. In addition, this is a matter which is very personal to me, I believe the Canadian court was misled, and I dwell on small details to try to prevent further errors and

misunderstanding of the case. I also find my capacity to manage my emotions while working on pleadings to be limited. This has become more acute recently as the children are being kept from me. I wish the situation was different but I find I am not resilient and I tend to become stunned.

I recently had to balance my court filings against completion of some courses to augment my resume. The result is evident; I had hoped to improve estimation of my legal drafting without success. In addition to the engineering course whose grade screenshot is attached, I have also completed a couple of computer courses that were ending March 25.

/s/ Grigore Vetrici

Grigore Vetrici

307, 935 Marine Drive

West Vancouver, BC V7T 1A7



Course Home

**Grades**

Discussion Forums

Messages

Resources

Course Info

5/5

Assignments Passed

98.8%

Final Course Grade

	Due	Weight	Passed	Grade
<b>Material Properties in Design</b>				
<b>Quiz:</b> Material Properties in Design 8 questions	Feb 18	20%	✓	100%
<b>Static Failure Theories - Part II</b>				
<b>Quiz:</b> Static Failure 10 questions	Mar 4	20%	✓	94%
<b>Fatigue Failure - Part I</b>				
<b>Quiz:</b> Fully Reversed Loading in Fatigue 2 questions	Mar 11	20%	✓	100%
<b>Fatigue Failure - Part II</b>				
<b>Quiz:</b> Fluctuating Fatigue and Miner's Rule 2 questions	Mar 18	20%	✓	100%
<b>Quiz:</b> Machine Design Part 1: Comprehensive Exam 3 questions	Mar 18	20%	✓	100%



**GRIGORE VETRICI - FILING PRO SE**

**April 06, 2018 - 11:00 AM**

**Transmittal Information**

**Filed with Court:** Supreme Court  
**Appellate Court Case Number:** 95327-9  
**Appellate Court Case Title:** In re the Marriage of: Raluca Vetrić and Grigore Vetrić  
**Superior Court Case Number:** 10-3-00585-5

**The following documents have been uploaded:**

- 953279\_Motion\_20180406105324SC917881\_9009.pdf  
This File Contains:  
Motion 1 - Extend Time to File  
*The Original File Name was Motion to amend and extend time.pdf*
- 953279\_Other\_20180406105324SC917881\_7024.pdf  
This File Contains:  
Other - Amended combined reply to answer to petition  
*The Original File Name was Amended Reply to Combined Answer.pdf*

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

- dpm@lifetime.legal
- drewmazzeo@outlook.com

**Comments:**

motion to extend time incorporates motion to amend

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