

FILED  
Court of Appeals  
Division I  
State of Washington  
11/8/2018 10:58 AM

SUPREME COURT OF THE STATE OF WASHINGTON

96501-3

STATE OF WASHINGTON,	)	
	)	
	)	MOTION TO ACCEPT
Respondent,	)	FILING OF PETITION FOR
	)	REVIEW IN COURT OF
	)	APPEALS NO. 76472-1-I
	)	
	)	
v.	)	
	)	
Pitsurenko, Vladimir	)	
Petitioner.	)	

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A. IDENTITY OF MOVING PARTY

Appellant, Vladimir Pitsurenko, moves this Court for the relief designated below.

B. STATEMENT OF RELIEF SOUGHT

In the interest of justice and pursuant to RAP 13.4(a), 13.6, 18.8, 18.6, Mr. Pitsurenko asks this Court to allow filing of his Petition for Review one day beyond the 30 days from issuance of the Court of Appeals opinion, No. 76472-1-I .

C. GROUND FOR RELIEF AND ARGUMENT

1. This Petition for Review was due on November 7, 2018, which was 30 days from the when the Court of Appeals opinion was issued.

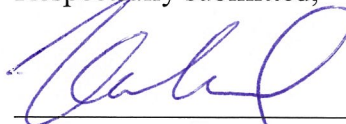
2. This Petition should have been on the calendar for filing on that day, but it was set instead for November 8; this was a miscalculation of one day. In the interest of justice, Mr. Pitsurenko asks this Court to accept filing of his Petition for Review on the morning following the 30 days allowed by RAP 13.4(a), because it was through no fault of his own that the date was miscalculated, and I filed the Petition for Review as soon as I recognized my error, on the following morning.

D. CONCLUSION

For the foregoing reasons, Mr. Pitsurenko respectfully requests this Court to accept filing of his Petition for Review one day after the 30 days allowed for filing of a Petition for Review as set out in RAP 13.4(a).

DATED this 8th day of November, 2018.

Respectfully submitted,



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KATE BENWARD (WSBA 43651)  
Washington Appellate Project (91052)  
Attorney for Petitioner

## DECLARATION OF FILING AND MAILING OR DELIVERY

The undersigned certifies under penalty of perjury under the laws of the State of Washington that on the below date, the original document **Motion for Extension of Time for filing Petition for Review to the Supreme Court** to which this declaration is affixed/attached, was filed in the **Court of Appeals** under **Case No. 76472-1-I**, and a true copy was mailed with first-class postage prepaid or otherwise caused to be delivered to the following attorney(s) or party/parties of record at their regular office or residence address as listed on ACORDS:

- respondent Ian Ith, DPA  
[PAOAppellateUnitMail@kingcounty.gov]  
[ian.ith@kingcounty.gov]  
King County Prosecutor's Office-Appellate Unit
- petitioner
- Attorney for other party



MARIA ANA ARRANZA RILEY, Legal Assistant  
Washington Appellate Project

Date: November 8, 2018

# WASHINGTON APPELLATE PROJECT

November 08, 2018 - 10:58 AM

## Transmittal Information

**Filed with Court:** Court of Appeals Division I  
**Appellate Court Case Number:** 76472-1  
**Appellate Court Case Title:** State of Washington, Respondent v. Vladimir Pitsurenko, Appellant  
**Superior Court Case Number:** 16-1-07447-9

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### Comments:

\*\*\*MOTION TO ACCEPT FILING OF PETITION FOR REVIEW

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