

Supreme Court #97637-6
IN THE SUPREME COURT OF THE STATE
OF
WASHINGTON

RECEIVED
SEP 24 2019
Washington State
Supreme Court

WASHINGTON STATE DEPARTMENT OF HEALTH

Respondent,

v.

ARELY JIMENEZ

Appellant

ON APPEAL FROM APPEALS COURT DIVISION I

Number 79690-9-1

Appellant's Motion for extension of time

Arely Jimenez, LMFT, Pro-se
981 Diane Avenue
Oak Harbor, WA. 98277

Table of Authorities

Scannell v. State **912 P.2d 489 (1996) 128 Wash. 2d 829** P – 3

RAP 1.2 (a)

P – 3

RAP 18.8 (b)

P – 2, 4

Attachments: Burial Program of Gloria Serrano,

This is a motion for a time extension to file a "Request for Review". Appellant received the "UNPUBLISHED OPINION"(UO) that was filed by the court on August 5, 2019, and was received by Appellant On August 10, 2019. Appellant missed the date that the UO was filed.

RAP 18.8 states *"The appellate court will only in extraordinary circumstances and to prevent a gross miscarriage of justice extend the time within which a party must file a notice of appeal, a notice for discretionary review, a motion for discretionary review of a decision of the Court of Appeals, a petition for review, or a motion for reconsideration."*

Appellant is filing this motion because she believes, that her circumstances are extraordinary in that during August and the beginning of September 2019, she had two tragedies. Appellant's niece, who had been ill for some time died on August 26, 2019 and Appellant's daughter's favorite Aunt died a week later. Appellant's entire family has been in mourning as these two people were younger members of our family.

Appellant's life has been extraordinarily impacted by the events. Appellant's daughter was extremely depressed as the Aunt that died took care of her as a child and was an integral part of her life. Her aunt was diagnosed with ALS four (4) months earlier and by September 9, she was being buried. Appellant had to deal with her daughter's grief, the family's grief and her own grief.

Appellant's niece was hospitalized in July 2019 and died on August 26th, 2019. Perhaps for other people this is not devastating for it has been for

Appellant. Appellant has held her daughter's hand throughout this time and other relatives. She traveled to assist with family issues and her mind played tricks on the date. As a point in fact Appellant did not see that the UO had a date when it was filed. After receiving the letter from the Supreme Court Appellant looked for the date and saw it right on the front page. Appellant believed she was filing the "Request for Review" on time. Appellant looked at the filing date in order to make this request and then the filing date jumped at her.

It is for this reason that Appellant requests a two days extension. Since Appellant has already submitted the "Request for Review" it is her belief that she only needs two days of time extension. If this is not true, Appellant requests the necessary time to make it right. Because the RAP 18.8(a) states:

Generally. The appellate court may, on its own initiative motion of a party, waive or alter the provisions of any of these rules and enlarge or shorten the time within which an act must be done in a particular case in order to serve the ends of justice

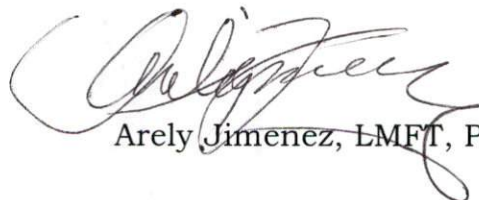
Appellant called Division I and they advised her to submit this motion to the Supreme Court.

As the court will ascertain after their review of Appellant's case, there are a lot of issues for which the response of the Supreme Court is most crucial. To this end Appellant has been determined, against the most negative of circumstances, to have this case come to the Supreme Court. It would be a "a gross miscarriage of justice" if her case was not permitted to be heard, bearing in mind the circumstances of her untimely mistake. Appellant is citing *Scannell v.*

State 912 P.2d 489 (1996) 128 Wash. 2d 829, as a point of reference as it has been most difficult to find cases that mirror Appellant's case. She is also confident that in accordance with RAP 1.2 (a) which states: *(a) Interpretation. These rules will be liberally interpreted to promote justice and facilitate the decision of cases on the merits. Cases and issues will not be determined on the basis of compliance or noncompliance with these rules except in compelling circumstances where justice demands, subject to the restrictions in rule 18.8(b).* Appellant trusts that this rule will be carried out. Appellant thanks God and the court for this rule.

Appellant is submitting the "Funeral program." for one of the deceased, the other person, my niece was buried the on the 27th, a day after her death and there was not enough time to create a program. Appellant has a video of the service.

Respectfully Submitted this 23rd day of September 2019


Arely Jimenez, LMFT, Pro se

Una Celebración de Vida

El Señor es mi pastor, nada me faltará.

*En lugares de delicados pastos
me hará descansar;*

Confortará mi alma;

*Me guiará por sendas de justicia
por amor de su nombre.*

*Aunque ande en valle de
sombra de muerte,*

*No temeré mal alguno,
porque tú estarás conmigo;*

*Tu vara y tu cayado me
infundirán aliento.*

*Aderezas mesa delante de mí en
presencia de mis angustiadores;*

*Unges mi cabeza con aceite;
mi copa está rebosando.*

*Ciertamente el bien y la misericordia me
seguirán todos los días de mi vida,*

Y en la casa de Jehová moraré por largos días.

Salmo 23



*En memoria de
Gloria Serrano*

Programa

<i>Servicio de Canto</i>	<i>Jóvenes de Glendora</i>	
<i>Bienvenida</i>	<i>Lizeth Serrano</i>	
<i>Himno Inicial #333</i>	<i>“Aunque en esta vida”</i>	
<i>Lectura Bíblica</i>	<i>Juan 14:1-3</i>	<i>Rudy Serrano</i>
<i>Oración</i>		<i>Rudy Serrano</i>
<i>Biografía</i>		<i>Julio Serrano Jr.</i>
<i>Canto Especial</i>		<i>Daissy López</i>
<i>Mensaje de Esperanza</i>		<i>Pastor Samuel Del Pozo</i>
<i>Canto Especial</i>		<i>Elvis Chirino</i>
<i>Fotos de Familia</i>		<i>Lizeth Serrano</i>
<i>Testimonios</i>		<i>Miembros de Familia</i>
<i>Canto Final</i>		<i>Aby Pleitez</i>
<i>Oración</i>		<i>Pastor Samuel Del Pozo</i>

Servicio de Entierro

Lunes, 9 de Septiembre

Velorio 1:00 – 3:00pm | Entierro 3:00pm

*Oakdale Mortuary
1401 S Grand Ave
Glendora, CA 91740*

Biografía

Mi madre se llamaba Gloria Serrano, nació el 3 de junio de 1966 en La Unión, El Salvador. Su madre es Victorina Osorto y su padre José López. Durante su adolescencia, asistió a la escuela Rubén Darío en San Salvador. Ella era miembro de las cachiporristas como una actividad extracurricular. Le gustaba ayudar a las personas y siempre ponía las necesidades de los demás por encima de las suyas. Tuvo una infancia feliz llena de alegría y asombro que compartió con sus hermanos: Juan, Ana, Merci, Rafael, José, Javier y Carmen. En 1988, emigro a los Estados Unidos, huyendo de un país plagado de guerra civil. Hizo el largo viaje a California desde El Salvador con la esperanza de un futuro mejor y pacífico. El 5 de octubre de 1989, se caso con Julio Cesar Serrano en la Iglesia Adventista del Séptimo Día en Glendora. En marzo de 1990, tuvieron su primer hijo, Lizeth, seguido de su segundo Julio en octubre de 1991. Mas tarde, en marzo de 1996, tuvieron a su hijo menor, Kaliman.

A pesar de su enfermedad, Gloria siempre fue optimista y feliz. Incluso hasta sus últimos momentos, ella se reía y le pedía a los familiares que le contaran chistes. Ella dejó un impacto duradero en la vida de todas las personas con las que entro en contacto. Su actitud amable y gentil fue algo que la distinguía. El impacto que tuvo en la iglesia fue tremendo, ya que siempre estuvo dispuesta a ayudar a quien lo pidiera. Ella nunca rechazo la oportunidad de ayudar y contribuir a los eventos de la iglesia. Su vision optimista de la vida era contagiosa y siempre ponía a Dios y a la familia por encima de todo. Le sobreviven su amado esposo, Julio Serrano, sus tres hijos, Lizeth, Julio y Kaliman. Ademas de su madre, Victorina Osorto, y sus hermanos: Juan Ramón, Mercedes Valentín, Ana Cruz, Rafael Sorto y Carmen López.

Ella ahora descansa esperando la bendita esperanza de la resurrección.

PROOF OF SERVICE

I declare under penalty of perjury, under the laws of the State of Washington that the following is true and correct:

I certify that I served a copy of this document on all parties or their counsel of record on September 23, 2019, via U.S. mail, postage prepaid.

Erin L. Lennon
Supreme Court Deputy Clerk
P.O. Box 40929
Olympia, WA. 98504-0929

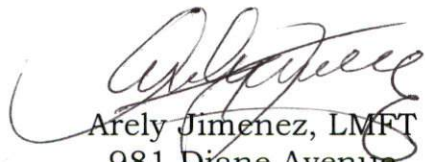
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Supreme Court

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Dated: September 23, 2017


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