

FILED
Court of Appeals
Division III
State of Washington
9/11/2019 8:00 AM

FILED
SUPREME COURT
STATE OF WASHINGTON
11/13/2019
BY SUSAN L. CARLSON
CLERK

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5 IN THE WASHINGTON STATE SUPREME COURT

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7 STATE OF WASHINGTON,

8 Plaintiff-Respondent,

9 vs.

10 EDWARD JEGLUM,

11 Defendant-Appellant.

Sup. Ct. No. 97843-3

Court of Appeals No. 35841-1-II

MOTION FOR EXTENSION OF TIME TO
PETITION FOR REVIEW

12 **I. IDENTITY OF MOVING PARTY**

13 Appellant Edward Jeglum, through his attorney, Suzanne Lee Elliott, seeks the relief
14 designated in Part II.

15 **II. RELIEF SOUGHT**

16 Appellant asks this Court to extend the time for filing his petition for review to
17 September 11, 2019.

18 **FOR RELIEF AND ARGUMENT**

19 RAP 18.8 (a) provides that this court may waive or alter the 30-day rule for filing
20 petitions in order to serve the ends of justice. Here extending the time for filing this Petition
21 would serve the ends of justice.

22 Here the Court of Appeals decided the State's "appeal" without any briefing from
23 Jeglum. As argued in the Petition itself, Jeglum was entitled to counsel on appeal and there is no
24 record that any court ever informed him of that right. *State v. Rafay*, 167 Wash. 2nd 644, 222
25 P.3rd 86 (2009). Because the Court of Appeals proceeded without any briefing filed on Jeglum's

MOTION FOR EXTENSION TO FILE A PETITION
FOR REVIEW - 1


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1 behalf, the Court of Appeals erred in making certain factual findings and erred in failing to
2 consider the controlling precedent from this Court.

3 Jeglum has now retained undersigned counsel in an attempt to rectify the errors made
4 below. It would be unjust to prevent Jeglum from seeking further review with the assistance of
5 counsel when trial and appellate court's failed to inform him of his rights on appeal.

6 DATED this 10th day of September 2019.

7 Respectfully submitted:

8 
9 _____
10 Suzanne Lee Elliott, WSBA 12634
11 Attorney for Edward Jeglum

12 **CERTIFICATE OF SERVICE**

13 I hereby certify that on the date listed below, I served by email where applicable and by
14 United States Mail, postage prepaid, one copy of the foregoing pleading on the following:

15 Andrew Van Winkle
16 Chelan County Prosecutor's Office
17 401 Washington Street
18 Wenatchee WA 98801-2899

19 9/10/19
20 _____
21 Date

22 
23 _____
24 Suzanne Lee Elliott

25 MOTION FOR EXTENSION TO FILE A PETITION
FOR REVIEW - 1

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September 10, 2019 - 9:48 PM

Transmittal Information

Filed with Court: Court of Appeals Division III
Appellate Court Case Number: 35841-1
Appellate Court Case Title: State of Washington v. Edward Lee Jeglum
Superior Court Case Number: 15-1-00084-6

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