

NO. 97882-4

**IN THE SUPREME COURT OF THE STATE OF WASHINGTON**

RICHARD L. FERGUSON,

Petitioner,

vs.

BAKER LAW FIRM, P.S., et  
al.,

Respondent

**PETITIONER'S MOTION  
FOR LEAVE TO AMEND  
OR SUPPLEMENT  
PRELIMINARY  
PETITION FOR REVIEW**

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**I. IDENTITY OF THE MOVING PARTY**

Petitioner, RICHARD L. FERGUSON, is the moving party and asks the Court for the relief requested below.

**II. RELIEF REQUESTED**

Mr. Ferguson asks the Court, for a summary determination under RAP 17.4(c), for leave to amend or supplement Petitioner's Preliminary Petition for Review within 30 days, (until February 21, 2020), for the reasons stated below.

Such an order is within the Court's authority to expand time under RAP 18.8(a), and would serve the ends of justice. This motion is not subject to the restrictions in RAP 18.8 sections (b) or (c), because the Petition for Review (Preliminary) was timely filed.

### **III. REASONS TO GRANT APPELLANT'S MOTION**

1. Mr. Ferguson timely filed his Petition for Review (Preliminary), and advised all parties that he intended to amend or supplement the Petition. Mr. Ferguson needs additional time to amend or supplement his petition.

2. This case involves important issues of constitutional law, in a case brought by an unrepresented party, which need to be properly briefed, before being argued, or considered by the Supreme Court.

3. This case involves decisions by the Trial Court and the Court of Appeals, which conflict with current case law, statutes, and the Rules of Civil Procedure. The issues need to be properly briefed, before being argued, or considered by the Supreme Court.

4. Mr. Ferguson is an unrepresented party. He is not an attorney, and lacks resources to hire adequate counsel. Mr. Ferguson is a former paralegal, and can do most of the legal work, although at a slower pace. Mr. Ferguson lacks the same legal resources as Respondents, and is unable to perform legal tasks as quickly as the Respondents (two attorneys, and two law firms) and their additional attorneys (a total of four attorneys, four law firms, and all the resources, associates, paralegals, secretaries, and support staff Respondents have available to them).

5. Mr. Ferguson suffers from moderate to severe depression and anxiety, sometimes debilitating, and needs additional time.

6. Respondents have been granted additional time to respond.

7. Respondents will not be prejudiced by the delay. Mr. Ferguson agrees that Respondents should be allowed the time they need to respond to an Amended Petition pursuant to RAP 13.4(d).

#### **IV. CONCLUSION**

Pursuant to RAP 18.8(a), good cause exists, and the ends of justice will be served by granting Mr. Ferguson 30 additional days to file Petitioner's Amended Petition for Review, and allowing Respondents additional time to respond.

RESPECTFULLY SUBMITTED this 22nd day of January, 2020.

*s/ Richard L. Ferguson*

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Richard L. Ferguson  
Pro Se Petitioner  
20012 72nd DR SE  
Snohomish, WA 98296  
ferg099@comcast.net  
360-668-9878

**V. DECLARATION**

1. I am Richard L. Ferguson, Petitioner in this matter, and I am over the age of eighteen (18), and am competent to testify to the matters herein.

2. I hereby declare that the statements in the Motion herein are true and correct to the best of my knowledge.

3. I am serving this Motion on all registered parties by electronically filing through the Court's Web Portal, and understand that it will be email-served to all parties. I am happy to provide a hard copy to any party upon request.

Sworn to under penalty of perjury under the laws of the State of Washington by Richard L. Ferguson, DATED this 22nd day of January, 2020.

*s/ Richard L. Ferguson*

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**RICHARD FERGUSON - FILING PRO SE**

**January 22, 2020 - 4:00 PM**

**Transmittal Information**

**Filed with Court:** Supreme Court  
**Appellate Court Case Number:** 97882-4  
**Appellate Court Case Title:** Richard Ferguson v. Baker Law Firm, P.S., et al.  
**Superior Court Case Number:** 17-2-07335-9

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**Comments:**

Motion for Leave to Amend Petition for Review

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