

FILED
SUPREME COURT
STATE OF WASHINGTON
8/11/2021 2:29 PM
BY ERIN L. LENNON
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Washington State Supreme Court No. 99707-1
Division III Court of Appeals No. 374963

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

In Re:

MARY CHINEYE EZENWA,
Petitioner,

v.

ALAN PHILIP CARLIN,
Vulnerable Adult.

REPLY TO PETITIONER'S 11TH MOTION TO AMEND
[Treated as Answer to 11th Motion to Amend](#)

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 B. Additional response to the various issues raised by Petitioner
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I. ISSUES PRESENTED FOR REVIEW

- A. Should the Supreme Court of the State of Washington grant Petitioner's 11th Motion to Amend Petition for Review?**
- B. Response to the Amended Petition and arguments contained in Petitioner's 11th Amended Petition for Review are reserved pending a decision by this Court.**

I. STATEMENT OF ISSUES

Petitioner Mary C. Ezenwa seeks leave to Amend her Petition for Review. To that end she filed, over time, eleven motions to amend along with amended petitions with each filing. This response is to the latest of said Motions to Amend.

II. LAW AND ARGUMENT

A. **The Supreme Court of the State of Washington should deny Petitioner's Motion to Amend her Petition for Review.**

Ms. Ezenwa's appeal was deemed frivolous. *See* Court of Appeals decision on file herein. Ms. Ezenwa continues to seek leave to relitigate this matter which should not be authorized by this court. Although granting a Motion to Amend is within the purview of this Court, allowing an amendment does not serve the interests of justice. Ms. Ezenwa has had the opportunity to present her briefing to this Court and a response has been filed. This Court should not permit her to amend. Any additional filings by Ms. Ezenwa should be rejected. The additional issues noted in her Motion to Amend are not applicable to whether leave should be granted, thus, responses to the argumentative statements therein are reserved pending review by this Court either granting or denying her Motion to Amend.

B. Responses to the remainder of the Amended Petition of Mary C. Ezenwa are reserved pending a decision by the Supreme Court to grant permission to file an amended petition for review.

Response Reserved pending a decision by this Court.

III. CONCLUSION

This court should deny Ms. Ezenwa's Motion for Leave to File an Amended Petition for Review.

RESPECTFULLY SUBMITTED this 11th day of August 2021.



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CERTIFICATE OF SERVICE

I, DIANNA J. EVANS, hereby certify that I served Mary C. Ezenwa, appellant pro se, via USPS regular mail, at the address indicated below, a true and correct copy of this Reply to Petitioner's 11th Motion to Amend, on file herein:

Mary C. Ezenwa
711 Commerce Way #13
Libby, MT 59923

I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED this 11th day of August 2021, at Spokane, Washington.



DIANNA J. EVANS, WSBA #45702

LAW OFFICE OF RICHARD W. PEREDNIA

August 11, 2021 - 2:29 PM

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: 99707-1
Appellate Court Case Title: Peter Carlin v. Mary C. Ezenwa
Superior Court Case Number: 20-2-00391-8

The following documents have been uploaded:

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