

COURT OF APPEALS, DIVISION I
OF THE STATE OF WASHINGTON

101058-3

AVI LEANNE TAYLOR,
Appellant,
vs.
MIRINA STONE,
Respondent

No. 19-2-05264-3 SEA
No. 826808

APPELLANT'S MOTION TO
EXTEND TIME TO FILE
PETITION FOR REVIEW

I. IDENTITY OF MOVING PARTY

Appellant Avi Taylor requests the relief as stated in part II.

II. STATEMENT OF RELIEF SOUGHT

Pursuant to RAP 18.8, appellant respectfully requests that these courts extend the time for filing her Petition for Review by four weeks to August 1st, 2022.

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3 III. FACTS RELEVANT TO MOTION

4 AND GROUNDS FOR RELIEF

5 The Petition for Review is currently due on Monday, July
6 4th, 2022. Miss Taylor respectfully requests a four-week
7 extension for the forgoing reasons:
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11 1. Petitioner has lost 8 out of the past 10 days to
12 intractable pain from bones dislocating in her neck and spine,
13 resulting in a severely hunched back and nerves pinching and
14 spasming, pain breathing while bones push into her lungs, and
15 much more. Moving has not been a prerequisite for this
16 unparalleled pain, it is while sitting, it wakes her up at night.
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20 It is considerably more difficult for her to organize her
21 thoughts when she is in this much pain, let alone be able to sit
22 and look at the screen and make any sense of anything. She is
23 still in pain now -albeit substantially less than the
24 aforementioned and consecutive 8 days- but she apologizes for
25 any incoherency that might still be spilling through.
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1 While the above has been happening since this collision, it
2 has been deteriorating over the past several years and over the
3 past few months, more markedly so. She spends her days
4 relocating bones and managing pain, trying to get to a place
5 where she can move, where she can work on this case. So she can
6 get the care she needs, to have any chance at regaining any
7 resemblance of her life and livelihood.
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11 She fears she will not have enough moving time in the next
12 week to finish this well. It seems a physical impossibility at
13 present, as she definitely needs more than the hopefully at least
14 1-2 days with moving time in the week ahead she will be
15 physically able to allocate.
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19 Then, the opinion issued in this case essentially rewrites
20 Washington state law regarding recovery of damages and
21 circumvents Supreme Court rulings, and this will impact many
22 more citizens than just Taylor. It is no small feat to communicate
23 and the fate of many more rests in her hands. She is doing her
24 absolute best to keep up with the deadlines, but is drowning in
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1 the damages and barely keeping her head above water most
2 days. She humbly asks for the time she lost so she can finish.
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5 2. RAP 18.8 vests these courts with the power to alter the
6 time within which an act must be done in order to serve the ends
7 of justice. In this case, Taylor was making great progress on her
8 petition prior to then being incapacitated for 8 out of the last 10
9 days; this qualifies as an extraordinary circumstance. Miss
10 Taylor wishes to exercise her right to request review, and asks
11 only for a four week extension so that she might have at least 5-8
12 moving days within that to complete her review. This extension
13 would allow her to recuperate briefly and then physically finish
14 her petition, thereby preventing a gross miscarriage of justice.
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21 3. Miss Taylor does not believe that any party will be
22 prejudiced by this modest enlargement of time. Furthermore,
23 this request is not being made for the purposes of delay, she is
24 eager to see this matter justly resolved, and only needs enough
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1 moving time to complete her review, to be able to get to that
2 point – it will prove to serve the ends of justice.
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5 4. In conclusion, it will be impossible for her to compose a
6 clear and effective petition by July 4th, 2022. She was making
7 good progress prior to the bout of lost time, and is cautiously
8 confident that given a four-week extension, she will be able to
9 clearly compose a petition for review. She respectfully asks these
10 courts to grant an extension of time to file her petition for review
11 to August 1st, 2022 to give her a fighting chance at finishing, in
12 the interests of justice, and to prevent a gross miscarriage of
13 justice for herself and future injured parties to come.
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20 Many thanks for the privilege of this Courts time and
21 consideration.
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23 Respectfully submitted this 29th of June, 2022, by,
24

25 *Avi Taylor*
26

27 Avi Taylor
28 Appellant

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6 This document contains 717 words, excluding the parts of
7 the document exempted from the word count by RAP 18.17.

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9 I hereby certify under penalty of perjury that the foregoing
10 is true and correct.

AVI TAYLOR - FILING PRO SE

June 29, 2022 - 3:37 PM

Transmittal Information

Filed with Court: Court of Appeals Division I
Appellate Court Case Number: 82680-8
Appellate Court Case Title: Avi Taylor, Appellant v. Mirina Stone, Respondent

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