

RECEIVED  
SUPREME COURT  
STATE OF WASHINGTON  
2013 SEP -9 P 2:18  
BY RONALD L. GATES  
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IN THE COURT OF APPEALS  
OF THE STATE OF WASHINGTON  
DIVISION II

*89265-2*

<p>In re the Marriage of: RONALD L. GATES Respondent KYON BRUNDAGE Appellant.</p>	<p>Court of Appeals No. 43574-8-II Lewis County Cause No. 11-3-00226-0 MOTION FOR EXTENSION OF TIME TO FILE PETITION FOR DISCRETIONARY REVIEW</p>
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1. IDENTITY OF MOVING PARTY

Kyon Brundage, Appellant, Pro Se, asks for the relief designated in Part

2.

1 2. STATEMENT OF RELIEF SOUGHT

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3 Extension of time to file her Petition for Discretionary Review from  
4 Friday, September 6, 2013 to Monday, September 9, 2013.  
5

6 3. FACTS RELEVANT TO MOTION

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8 On August 7, 2013, an Order Denying Motion to Modify was entered. I  
9 could no longer afford my appeals court lawyer, Mr. Dickinson, so I had  
10 Chuck Haunreiter help me write my Petition for Discretionary Review.  
11

12 My Petition for Discretionary Review was due on September 6, 2013. I  
13 had planned on filing and serving my Petition the afternoon of Friday,  
14 September 6<sup>th</sup>.  
15

16 Unfortunately, there was a huge thunderstorm the afternoon of  
17 September 5<sup>th</sup>. The lights went out once a little after 4 p.m until a little  
18 before 5 p.m. Then they went out about 8 p.m. and did not come back on  
19 until around 3 a.m. on the 6<sup>th</sup>. Since the electricity went off twice on  
20 September 5<sup>th</sup>, Chuck was unable to finish my Petition in time for me to  
21 file and serve my Petition in Tacoma. He has written a separate

1 declaration in support of my Motion for Extension of Time.

2  
3 4. Grounds for Relief and Argument

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5 RAP 18.8 authorizes an extension of time on motion of a party in order  
6 to serve the ends of justice. I believe Chuck could have finished my  
7 papers in time for me to file and serve them on September 6<sup>th</sup> if the lights  
8 had not gone out. There was nothing I could do about that. It was  
9 completely out of my control.

10  
11 We know Mr. Gates is going to object to my Motion for Extension of  
12 Time. He wants to run the table like he did in the trial court where I did  
13 not have an attorney because Judge Hunt refused to grant me a  
14 continuance of only a couple weeks when my attorney had a scheduling  
15 conflict. I am asking the Supreme Court to at least look at my Petition  
16 for Discretionary Review.

17  
18 I certify under penalty of perjury under the laws of the state of  
19 Washington that the foregoing statements are true and correct.

20  
21 Respectfully submitted this 9<sup>th</sup> day of September, 2013.



**Kyon Brundage**

**Appellant, Pro Se**

**Chehalis, WA**

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**MOTION FOR EXTENSION OF  
TIME TO FILE PETITION FOR  
DISCRETIONARY REVIEW**