

91815-5

RECEIVED
SUPREME COURT
STATE OF WASHINGTON
Jul 10, 2015, 12:54 pm
BY RONALD R. CARPENTER
CLERK

ORIGINAL

**COURT OF APPEALS DIVISION III
OF THE STATE OF WASHINGTON**

STATE OF WASHINGTON,)	RECEIVED BY E-MAIL
Respondent)	Cause No. 32197-5
)	
v.)	
)	MOTION FOR EXTENSION
ERIN E. MCGOVERN,)	OF TIME TO FILE
Petitioner)	PETITION FOR REVIEW
_____)	

I. IDENTITY OF MOVING PARTY

ERIN E. MCGOVERN, Appellant, through counsel, PHELPS & ASSOCIATES, PS, respectfully requests the relief designated in Part II below.

II. STATEMENT OF RELIEF SOUGHT

Counsel for Appellant requests an extension of time for filing the Petition for Review.

III. FACTS RELEVANT TO MOTION

Petition for Review is due July 10, 2015.

IV. GROUNDS FOR RELIEF AND ARGUMENT

Douglas Phelps, Attorney for Petitioner, is requesting a 30-day extension of time to complete the petition. Appellant's counsel has many appellate and trial briefs due at the same time as this brief and throughout the month of July so that it is impossible to adequately complete this brief by its current due date. Moreover,

 ORIGINAL

Mr. Phelps just completed a two week trial and has been unable to adequately prepare this Motion. No prejudice to either party is expected to result from this extension.

Submitted this 10th day of July, 2015.



Douglas D. Phelps, WSBA #22620
Attorney for Appellant

SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON)	
Respondent)	No. 32197-5
)	
v.)	
)	DECLARATION OF SERVICE
ERIN MCGOVERN)	FOR MOTION FOR EXTENSION
Appellant)	OF TIME TO FILE PETITION
)	FOR REVIEW
_____)	

Amber Henry, sworn under penalty of perjury under the laws of the State of Washington, declares and says the following is true and correct:

On the 10th day of July, 2015, a copy of the MOTION FOR EXTENSION OF TIME TO FILE PETITION FOR REVIEW, was hand-delivered to:

COURT OF APPEALS DIVISION III
500 N. CEDAR ST
SPOKANE, WA 99201

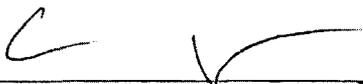
On the 10th day of July, 2015, a copy of the MOTION FOR EXTENSION OF TIME TO FILE PETITION FOR REVIEW, was emailed to:

WASHINGTON STATE SUPREME COURT
415 12TH AVE. SW
OLYMPIA, WA 98504
Supreme@courts.wa.gov

On the 10th day of July, 2015, a copy of the MOTION FOR EXTENSION OF TIME TO FILE PETITION FOR REVIEW, was hand-delivered to:

SPOKANE COUNTY PROSECUTOR
1100 W. MALLON
SPOKANE, WA 99260

Dated this 10th day of July, 2015.



AMBER HENRY

OFFICE RECEPTIONIST, CLERK

To: Amber C. Henry
Subject: RE: Erin McGovern Filing

Rec'd 7/10/2015

Supreme Court Clerk's Office

Please note that any pleading filed as an attachment to e-mail will be treated as the original. Therefore, if a filing is by e-mail attachment, it is not necessary to mail to the court the original of the document.

From: Amber C. Henry [mailto:amberh@phelpslaw1.com]
Sent: Friday, July 10, 2015 12:41 PM
To: OFFICE RECEPTIONIST, CLERK
Subject: Erin McGovern Filing

Good afternoon,

Please find attached a Motion for extension of time to file the Petition for Review for Erin McGovern. COA#: 32197-5.

Regards,

Amber Henry, WSBA#: 49146
amberh@phelpslaw1.com
Phelps & Assoc.
2903 N. Stout
Spokane, WA 99203
509-892-0467