

Nov 15, 2016, 8:41 am

RECEIVED ELECTRONICALLY

SUPREME COURT
OF THE STATE OF WASHINGTON

MICHAEL AMES,

Petitioner,

v.

PIERCE COUNTY,

Respondent.

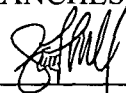
NO. 93428-2

MOTION FOR EXTENSION OF
TIME TO FILE ANSWER TO
AMICI BRIEF THREE HOURS
LATE

COMES NOW petitioner Michael Ames and asks this Court to grant him leave from the time requirements for filing his Answer to the Amici Brief pursuant to RAP 10.2 and 18.8 by three hours. This motion is based on the affixed declaration of Joan K. Mell.

DATED this 14th day of November, 2016 at Fircrest, WA.

III BRANCHES LAW, PLLC



Joan K. Mell, WSBA # 21319
Attorney for Michael Ames

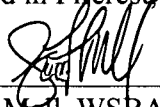
III BRANCHES LAW, PLLC
Joan K. Mell
1019 Regents Blvd. Ste. 204
Fircrest, WA 98466
joan@3brancheslaw.com
252-566-2610

DECLARATION

I, Joan K. Mell, make the following statement under oath subject to penalty of perjury under the laws of the State of Washington:

1. I am over the age of 18, competent to be a witness, and personally knowledgeable about the facts in this declaration. I am the attorney for Michael Ames.
2. Michael Ames respectfully requests that the Court grant him an additional three hours to timely file his Answer to the Amici Brief.
3. I did not meet the four o'clock deadline for filing the Answer Brief to Amici because I had not adequately communicated to my new staff that we would be filing the brief today. Staff who were familiar with this matter are no longer here. My calendar today included back to back meetings throughout the morning and I did not realize that I had not provided the proper guidance until after noon. I was in a telephone conference and had to complete my conference call and then meet with staff to finalize the briefing. I have ensured the brief has been served on opposing counsel and Amici today, within hours of when the brief would have been considered timely filed.

Executed in Fircrest, Washington, this 14th day of November, 2016.



Joan K. Mell, WSBA # 21319