

COURT OF APPEALS, DIVISION I
OF THE STATE OF WASHINGTON

WARREN E. BOHON,
Plaintiffs/Petitioners,
v.
CITY OF STANWOOD,
Defendant/Respondent.

No. 73195-5-I

**RESPONDENT CITY
OF STANWOOD'S
ANSWER AND
OPPOSITION TO
PLAINTIFF'S
REQUEST FOR
EXTENSION OF
TIME FOR FILING A
PETITION FOR
REVIEW TO THE
SUPREME COURT**

FILED
SEP 19 2016
WASHINGTON STATE
SUPREME COURT

2016 SEP 14 PM 1:00
COURT OF APPEALS DIV I
STATE OF WASHINGTON

I. RELIEF REQUESTED

Respondent City of Stanwood requests the court deny Appellant's request for an extension of time for filing a Petition for Review and terminate review of this matter.

II. ARGUMENT

On September 13, 2016, the Court of Appeals clerk issued a letter indicating that "a petition for review has been filed in the above case. It appears from the record that counsel has been served with a copy of the petition for review" (emphasis added). The letter then directed the parties to proceed in compliance with RAP 13.4, which provides guidelines for the process of Petitioning the Washington Supreme Court for review.

Actually, the document that was served on counsel was Appellant/Plaintiff Bohon's "Request for a 90 day extension of time to file a request for review by the Washington State Supreme Court" (emphasis added). Unless an additional document has been filed with the Court that

was not served on counsel for Respondent City, no "Petition for Review" has been filed in this matter. The deadline for filing such a petition was September 12, 2016, based on the August 11, 2016 Court of Appeals' Order Denying [Appellant's] Motion for Reconsideration of the Court's June 13, 2016 opinion. See, RAP 13.4(a).

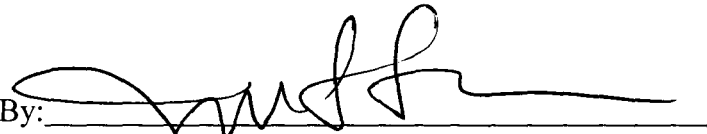
Mr. Bohon's request for a further extension should be denied. He failed to timely file a Petition for Review in compliance with RAP 13.4, and he has failed to state any basis sufficient to warrant further extension of time to file such a petition, or sufficient grounds for Supreme Court review of the Court of Appeals' Order and, thus, this matter should be terminated.

III. CONCLUSION

The Court should deny Appellant's request for yet another extension of time for filing a Petition for Review and terminate review of this matter.

Respectfully submitted this 14th day of September, 2016.

KEATING, BUCKLIN & MCCORMACK, INC., P.S.

By: 
Jayne L. Freeman, WSBA #24318
Attorney for Defendant City of Stanwood

DECLARATION OF SERVICE

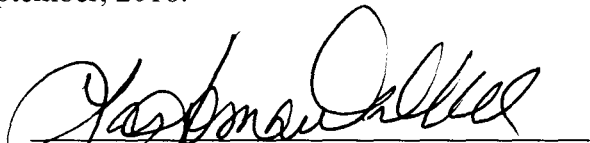
I declare that on September 14, 2016, a true and correct copy of the foregoing document was sent to the following parties of record via method indicated:

Pro Se Appellant

Warren Bohon
881 East Port Susan Terrace Rd
Camano Island, WA 98292

First Class U.S. Mail

DATED this 14th day of September, 2016.


LaHoma Walker, Legal Assistant

FILED
COURT OF APPEALS DIV 1
STATE OF WASHINGTON
2016 SEP 14 PM 1:01