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SUPREME COURT
STATE OF WASHINGTON

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94673-6

**IN THE SUPREME COURT OF THE STATE OF
WASHINGTON**

(Division III Case Number 350525)

T.L.M, Respondent

v.

Kerry Milliken, Appellant

**Motion to Consolidate Division III Case Cumbers
34988-8-III and 35052-5-III**

Craig Mason, WSBA#32962
Attorney for Appellant
W. 1707 Broadway
Spokane, WA 99201
509-443-3681

 ORIGINAL

I. Party Moving for Consolidation of Appeals: Kerry Milliken

Kerry Milliken -- appellant in Division III case numbers 34988-8-III and 35052-5-III -- appears to ask the State Supreme Court to consolidate the two Petitions for Review

II. Relief Sought: Consolidation of CHINS Cases under RAP 3.3(b)

Ms. Milliken asks the Supreme Court to consolidate the two CHINS petition requests for review under RAP 3.3(b).

III. Facts Relevant to Motion: Same Parties and Same Issues

The two CHINS petitions and orders at issue involve the same parties: TLM, juvenile petitioner, and Kerry Milliken, mother of TLM, as respondent. The two CHINS petitions raise the same issues of the statutory insufficiency of the pleadings and of the facts, and raise the same request that the constitutional decisions of Washington State be applied to CHINS, and seek a determination that strict scrutiny be required of such schemes which so intrude upon parental rights. The filed pleadings are incorporated herein.

IV. Basis of Relief: Same Parties and Same Issues and RAP 3.3 (b)

RAP 3.3(b) provides for consolidation of cases on appeal "if consolidation would save time and expense and provide a fair review of the cases." Such a motion is made by Kerry Milliken under RAP 17, as,

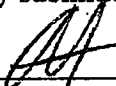
on the court file incorporated herein, fair review and judicial economy would be served by consolidation.

NOTE: As Ms. Milliken is indigent, she has not been charged any legal fees for the entire appeal process; however, she is paying costs, and consolidation would reduce the cost burden to her.

The court is asked to decide the consolidation summarily, without oral argument.

Consolidated review is requested.

Respectfully submitted on 6/20/17,



Craig A. Mason, WSBA#32962
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masonlawcraig@gmail.com

RECEIVED
SUPREME COURT
STATE OF WASHINGTON

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6/20/2017 2:48 pm

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IN THE SUPREME COURT OF THE STATE OF
WASHINGTON

(Division III Cause No. 350525)

T.L.M., Respondent

v.

Kerry Milliken, Appellant

PROOF OF SERVICE RE Motion to Consolidate

On the 20th day of June, 2017, I caused to be served a true and correct copy of Appellant's MOTION TO CONSOLIDATE to all interested parties to this action as follows:

Via 12:50 p.m. transmittal confirmation, the Motion to Consolidate was received by SUPREME@courts.wa.gov.

A copy of this Proof of Service was delivered via EWAS to:

**David Andrew Carter
Spokane County Public Defenders
1033 W. Gardner
Spokane, WA 99260-0280**


LORI MASON
Paralegal to Craig A. Mason



ORIGINAL

OFFICE RECEPTIONIST, CLERK

To: Lori Mason
Cc: Craig Mason
Subject: RE: TLM v. Kerry Milliken FILING 35052-5-III

Rec'd 6/20/17

ATTENTION COURT FILERS: The Supreme Court and the Court of Appeals now have a web portal to use for filing documents. As a result, the Supreme Court will discontinue accepting filings by e-mail effective June 30, 2017. We encourage you to register for and begin using the appellate courts web portal for all your filings as soon as possible.

Here is a link to the website where you can register to use the web portal: <https://ac.courts.wa.gov/>
A help page for the site is at: <https://ac.courts.wa.gov/index.cfm?fa=home.showPage&page=portalHelp>
Registration FAQs: <https://ac.courts.wa.gov/content/help/registrationFAQs.pdf>

Registration for and use of the web portal is free and allows you to file in any of the divisions of the Court of Appeals as well as the Supreme Court. The portal will automatically serve other parties who have an e-mail address listed for the case. In addition, you will receive an automated message confirming that your filing was received.

From: Lori Mason [mailto:masonlawlori@gmail.com]
Sent: Tuesday, June 20, 2017 12:29 PM
To: OFFICE RECEPTIONIST, CLERK <SUPREME@COURTS.WA.GOV>
Cc: Craig Mason <masonlawcraig@gmail.com>
Subject: TLM v. Kerry Milliken FILING 35052-5-III

A Petition for Review was recently filed in this case. We do not have the new case number yet.

Please see attached Motion to Consolidate.

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**Lori Mason, paralegal to
Craig A. Mason**

MASON LAW
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Office: 509-443-3681
Mobile: 509-993-1917
Fax: 509-462-0834

OFFICE RECEPTIONIST, CLERK

From: OFFICE RECEPTIONIST, CLERK
Sent: Tuesday, June 20, 2017 2:49 PM
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Received 6-20-17.

Supreme Court Clerk's Office

ATTENTION COURT FILERS: The Supreme Court and the Court of Appeals now have a web portal to use for filing documents. As a result, the Supreme Court will discontinue accepting filings by e-mail effective June 30, 2017. We encourage you to register for and begin using the appellate courts web portal for all your filings as soon as possible.

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Sent: Tuesday, June 20, 2017 2:42 PM
To: OFFICE RECEPTIONIST, CLERK <SUPREME@COURTS.WA.GOV>
Cc: Craig Mason <masonlawcraig@gmail.com>
Subject: TLM v. Kerry Milliken FILING 35052-5-III

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**Lori Mason, paralegal to
Craig A. Mason**

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