

FILED  
Court of Appeals  
Division II  
State of Washington  
9/28/2018 11:58 AM

FILED  
SUPREME COURT  
STATE OF WASHINGTON  
10/1/2018  
BY SUSAN L. CARLSON  
CLERK

96374-6

IN THE COURT OF APPEALS  
FOR THE STATE OF WASHINGTON  
DIVISION II

STATE OF WASHINGTON, )  
Respondent, ) Court of Appeals No. 49749-2-II  
v. )  
MORGAN B. WILLIAMS, ) MOTION FOR PERMISSION TO FILE  
Appellant. ) AMENDED PETITION FOR REVIEW

1. Identity of Moving Party. Attorney Marie J. Trombley, on behalf of Appellant Morgan Williams asks for the relief designated in Part 2.

2. Statement of Relief Sought. Morgan Williams requests permission to file an amended petition for review.

3. Facts Relevant to Motion.

The facts relevant to this motion are contained in the Declaration of Counsel filed herewith and are incorporated by reference. Mr. Williams filed a Statement of Additional Grounds as part of his direct appeal. The Court of Appeals ruled on the legal issues that he raised. An Amended Petition for Review is filed herewith.

MOTION FOR PERMISSION TO FILE  
AMENDED PETITION FOR REVIEW  
-PAGE 1 of 4

Marie J. Trombley  
Attorney at Law  
PO Box 829  
Graham, WA 98338  
253-445-7920  
Email: marietrombley@comcast.net

1  
2 4. Grounds for Relief Sought.

3 The legal issues raised by Mr. Williams in his Statement of Additional Grounds should  
4 be included in this Court's review in determining whether to accept this petition. The court and  
5 parties would benefit from an amended petition for review, to allow for a full review of all legal  
6 issues raised in Mr. Williams' direct appeal.

7 RAP 17.4(c) permits the commissioner or clerk to summarily determine without oral  
8 argument a motion that does not affect a substantial right of a party.

9 For the reasons stated, counsel asks the Court to grant her motion.

10 Respectfully submitted September 28, 2018.

11  
12 s/Marie Trombley  
13 WSBA # 41410  
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23 MOTION FOR PERMISSION TO FILE  
24 AMENDED PETITION FOR REVIEW  
-PAGE 2 of 4

25 Marie J. Trombley  
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IN THE COURT OF APPEALS  
FOR THE STATE OF WASHINGTON  
DIVISION II

STATE OF WASHINGTON,	)	
Respondent,	)	Court of Appeals No. 49749-2-II
v.	)	
	)	DECLARATION OF COUNSEL AND
MORGAN B. WILLIAMS,	)	CERTIFICATE OF SERVICE
Appellant.	)	

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Marie J. Trombley declares as follows:

I am the attorney appointed to represent Williams. Mr. Williams filed a Statement of Additional Grounds as part of his direct appeal. The Court of Appeals ruled on the legal issues that he raised. I am submitting an amended copy of the petition for review for filing, and request that the court accept it in place of the originally filed petition.

MOTION FOR PERMISSION TO FILE  
AMENDED PETITION FOR REVIEW  
-PAGE 3 of 4

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CERTIFICATE OF SERVICE

I, Marie Trombley, do hereby certify under penalty of perjury under the laws of the state of Washington, that on September 28, 2018, I mailed to the following US Postal Service first class mail, the postage prepaid, or electronically served, by prior agreement between the parties, a true and correct copy of the motion to the following: Clark County Prosecuting Attorney (at prosecutor@clark.wa.gov).

s/Marie Trombley  
WSBA # 41410  
PO Box 829  
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253-445-7920  
Email: marietrombley@comcast.net

MOTION FOR PERMISSION TO FILE  
AMENDED PETITION FOR REVIEW  
-PAGE 4 of 4

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**MARIE TROMBLEY**

**September 28, 2018 - 11:58 AM**

**Transmittal Information**

**Filed with Court:** Court of Appeals Division II  
**Appellate Court Case Number:** 49749-2  
**Appellate Court Case Title:** State of Washington, Respondent v Morgan Brice Williams, Appellant  
**Superior Court Case Number:** 16-1-00559-4

**The following documents have been uploaded:**

- 497492\_Motion\_20180928115516D2289427\_3462.pdf  
This File Contains:  
Motion 1 - Other  
*The Original File Name was William Motion Amended P4R.pdf*
- 497492\_Petition\_for\_Review\_20180928115516D2289427\_2501.pdf  
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Petition for Review  
*The Original File Name was Williams Amended P4R.pdf*

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**Comments:**

Amended

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Sender Name: Valerie Greenup - Email: valerie.mtrombley@gmail.com

**Filing on Behalf of:** Marie Jean Trombley - Email: marietrombley@comcast.net (Alternate Email: )

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