

FILED
Court of Appeals
Division I
State of Washington
11/29/2018 11:18 AM

NO. 96560-9

(Court of Appeals No. 76220-6-I)

IN THE SUPREME COURT
OF THE STATE OF WASHINGTON

FREEDOM FOUNDATION,

Petitioner/Defendant,

v.

SEIU HEALTHCARE NORTHWEST TRAINING PARTNERSHIP,

Respondent/Plaintiff.

**RESPONDENT SEIU HEALTHCARE NORTHWEST TRAINING
PARTNERSHIP'S ANSWER TO APPELLANT EVERGREEN
FREEDOM FOUNDATION'S MOTION FOR EXTENSION OF
TIME TO FILE PETITION FOR REVIEW**

Eleanor Hamburger (WSBA #26478)
Richard E. Spoonemore (WSBA #21833)
SIRIANNI YOUTZ
SPOONEMORE HAMBURGER
701 Fifth Avenue, Suite 2560
Seattle, WA 98104
Telephone: (206) 223-0303
Facsimile: (206) 223-0246
Email: ele@sylaw.com
rick@sylaw.com
Attorneys for Respondent

I. ANSWER

Respondent, SEIU Healthcare NW Training Partnership (“Training Partnership”) opposes the Appellant Evergreen Freedom Foundation’s (“EFF”) Motion for extension of time to file petition for review, submitted on November 28, 2018 at 4:58 pm. While the Training Partnership sympathizes with Ms. Earl-Hubbard’s loss of a parent last month, the “extraordinary circumstances” and “gross miscarriage of justice” required to extend the time to file a petition for review are not shown here. RAP 18.8(b); *FutureSelect Portfolio Mgmt., Inc. v. Tremont Grp. Holdings, Inc.*, 190 Wn.2d 281, 295, 413 P.3d 1 (2018). This interlocutory appeal should be terminated and the case returned to the trial court for continued proceedings. EFF’s Motion for extension of time should be denied and its late-filed petition for review dismissed as untimely.

DATED: November 29, 2018.

SIRIANNI YOUTZ
SPOONEMORE HAMBURGER

s/ Eleanor Hamburger

Eleanor Hamburger (WSBA #26478)
Richard E. Spoonemore (WSBA #21833)
701 Fifth Avenue, Suite 2560
Seattle, WA 98104
Tel. (206) 223-0303
Email: ele@sylaw.com
rick@sylaw.com
Attorneys for Respondent

CERTIFICATE OF SERVICE

I certify, under penalty of perjury under the laws of the State of Washington, that on November 29, 2018, I served a copy of the foregoing RESPONDENT SEIU HEALTHCARE NORTHWEST TRAINING PARTNERSHIP'S ANSWER TO APPELLANT EVERGREEN FREEDOM FOUNDATION'S MOTION FOR EXTENSION OF TIME TO FILE PETITION FOR REVIEW on all counsel of record as indicated below:

Michele Earl-Hubbard
Allied Law Group
P.O. Box 33744
Seattle, WA 98133

Attorneys for Freedom Foundation

[x] By Email via Washington
State Appellate Court's Portal
michele@alliedlawgroup.com

DATED: November 29, 2018, at Seattle, Washington.

s/ Eleanor Hamburger
Eleanor Hamburger (WSBA #26478)
Email: ehamburger@syllaw.com
Attorneys for Respondent

SIRIANNI YOUTZ SPOONEMORE HAMBURGER

November 29, 2018 - 11:18 AM

Transmittal Information

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Appellate Court Case Title: Seiu Healthcare NW Training Partnership, Respondent v. Evergreen Freedom Foundation, Petitioner
Superior Court Case Number: 16-2-20264-1

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- 762206_Answer_Reply_to_Motion_20181129111619D1542768_7063.pdf
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A copy of the uploaded files will be sent to:

- JAbernathy@FreedomFoundation.com
- info@alliedlawgroup.com
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Address:

701 5th Ave., Suite 2560

Seattle, WA, 98104

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