

SUPREME COURT OF THE STATE OF WASHINGTON

ANGELA HELVEY,

Petitioner,

v.

EMPLOYMENT SECURITY
DEPARTMENT, ET AL.,

Respondents.

DEPARTMENT'S
ANSWER TO
MOTION TO
AMEND PETITION
FOR REVIEW

The Court should deny Ms. Helvey's motion to amend her petition for review. Ms. Helvey previously attempted to file an amended petition. In a letter dated November 19, 2024, the Court rejected that filing because there is no provision in the Rules of Appellate Procedure for filing an amended petition for review. The Court noted that if a party wishes to amend a filing, they should file a motion to amend.

Ms. Helvey has now re-filed her amended petition nearly word for word and merely changed the caption of the pleading to "Motion to Amend Petition for Review." Because the pleading

contains no actual motion or grounds for relief to file an amended petition, the Court should deny the “Motion” and reject the pleading.

I certify that this document contains 124 words, excluding the parts of the document exempted from the word count by RAP 18.17.

RESPECTFULLY SUBMITTED this 04th day of December, 2024.

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PROOF OF SERVICE

I, Audrey S. Price, certify that I caused to be served a copy of **Department's Answer to Motion to Amend Petition for Review** on all parties or their counsel of record on the date below as follows:

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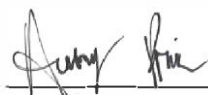
ANGELA HELVEY
helveya@gmail.com

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SARAH R. PENDLETON, ACTING CLERK
WASHINGTON STATE SUPREME COURT
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I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED this 04th day of December 2024, in Olympia,
Washington.



AUDREY S. PRICE, Paralegal

AGO/LICENSING AND ADMINISTRATIVE LAW DIV

December 04, 2024 - 1:59 PM

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: 103,493-8
Appellate Court Case Title: Angela Helvey v. Employment Security Department, et al.
Superior Court Case Number: 23-2-00303-1

The following documents have been uploaded:

- 1034938_Answer_Reply_20241204135748SC638734_0640.pdf
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