

FILED
Court of Appeals
Division III
State of Washington
7/23/2025 8:00 AM

FILED
SUPREME COURT
STATE OF WASHINGTON
7/28/2025
BY SARAH R. PENDLETON
CLERK

SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,
Plaintiff, Appellee

v.

SAVELIN SAVA SOCHIRCA,
Defendant, Appellant

Supreme Court No. 1040695

Grant Co. Superior
No 22-1-00054-9

COA No. 39751-3-III

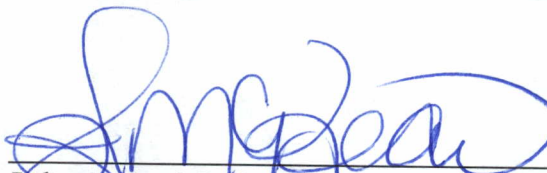
MOTION AND
DECLARATION FOR
EXTENSION OF TIME
TO FILE PETITIONER'S
AMENDED BRIEF

MOTION

COMES NOW JOHN LUKE McKEAN, attorney for Appellant and moves this court for an order extending the time for filing the Appellant's Amended Brief to the date of actual filing. This motion is based on the accompanying Declaration of John Luke McKean.

DATED this 22 day of July 2025.

McKEAN LAW OFFICE P.S. CORP.



John Luke McKean, WSBA #13294
Attorney for Appellant

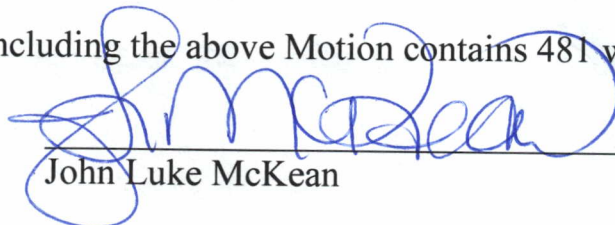
DECLARATION OF JOHN LUKE MCKEAN

John Luke McKean, attorney for Appellant, under penalty of perjury states as follows:

I am requesting that the time for filing Petitioner's Amended Brief be extended to the date of actual filing for the reason that I never saw the letter and order dated June 23, 2025, and was completely unaware of it until today. I only became aware of that letter and order today, July 22, 2025, as I was reviewing my emails prior to leaving the office. I am an older attorney and do not always keep regular office hours. I try to keep up with my emails but am not totally consistent about it. As a result, we try to make sure that my assistant is copied on all critical emails in case I miss one. Unfortunately, I am the only person who receives emails from the court of appeals and supreme court so my assistant could not back me up on this. Another complication is that I receive numerous emails every day from various news sources and list serves. It is easy for me to overlook an email. I also do not get many emails from the court and am not accustomed to recognizing them.

Signed this 22 day of July 2025 at Moses Lake, Washington.

I certify that this document including the above Motion contains 481 words.



John Luke McKean

CERTIFICATE OF SERVICE

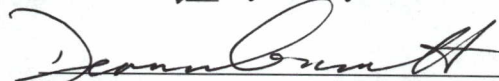
I hereby certify that I am a citizen of the United States and of the State of Washington. I am over the age of eighteen (18), not a party to the above-entitled cause and competent to be a witness therein and that I caused to be served a true and correct copy of the foregoing **MOTION AND DECLARATION FOR EXTENSION OF TIME TO FILE APPELLANT'S BRIEF** in the above cause to the individual(s) below by the method indicated.

Deputy Prosecuting Attorney
Grant County Prosecutor's Office
PO Box 37
Ephrata, WA 98823

**The Court of Appeals of the
State of Washington Division II**
500 N Cedar St
Spokane, W 99201-1905

<input checked="checked" type="checkbox"/>	COA Electronic Portal jmillard@grantcountywa.gov kimccrae@grantcountywa.gov
<input checked="checked" type="checkbox"/>	E-Filed

DATED this 22 day of July 2025


Deanna Garrett, Legal Assistant

MCKEAN LAW OFFICE, PSC

July 22, 2025 - 9:53 PM

Transmittal Information

Filed with Court: Court of Appeals Division III
Appellate Court Case Number: 39751-3
Appellate Court Case Title: State of Washington v. Savelin Sava Sochirca
Superior Court Case Number: 22-1-00054-9

The following documents have been uploaded:

- 397513_Motion_20250722214027D3177803_4656.pdf
This File Contains:
Motion 1 - Extend Time to File
The Original File Name was 2025.07.22.Motion and Declaration for Extention of Time.pdf
- 397513_Petition_for_Review_20250722214027D3177803_4211.pdf
This File Contains:
Petition for Review
The Original File Name was 2025.07.22.Amended Petition for Discretionary Review.pdf

A copy of the uploaded files will be sent to:

- jmillard@grantcountywa.gov
- kjmccrae@grantcountywa.gov

Comments:

Amended Petition per request of Supreme Court.

Sender Name: Deanna Garrett - Email: Deanna@mckeanlawoffice.com

Filing on Behalf of: John L. Mckean - Email: luke@mckeanlawoffice.com (Alternate Email:)

Address:

704 E. Olive Ave.
Moses Lake, WA, 98837
Phone: (509) 765-4451

Note: The Filing Id is 20250722214027D3177803