

FILED  
SUPREME COURT  
STATE OF WASHINGTON  
8/26/2025 3:36 PM  
BY SARAH R. PENDLETON  
CLERK

No. 1043708

IN THE SUPREME COURT  
IN AND FOR THE STATE OF WASHINGTON

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JENNIFER ASHLEY REEDAL,  
Respondent,

v.

ADNAN ALI KHAKI,  
Appellant.

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APPELLANT'S MOTION FOR  
EXTENTION OF TIME TO FILE  
ANSWER TO RESPONDENT'S  
MOTION FOR DISCRETIONARY  
REVIEW OF DECISION  
TERMINATING REVIEW

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Collin McKean, WSB #42261  
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**A. IDENTITY OF MOVANT**

Appellant, Adnan Khaki, by and through counsel asks this court to extend the time to file his answer to respondent's motion for discretionary review of decision terminating review in this matter.

**B. FACTS RELEVANT TO MOTION & AFFIDAVIT/DECLARATION OF COUNSEL**

I, Collin McKean, declare under penalty of perjury pursuant to the laws of the State of Washington that I am the counsel of record for the above-named appellant, am over the age of 18, and am competent to testify in a court of law. I submit the following facts on information and belief for purposes of this motion only:

Respondent filed a motion to reconsider and appellant's answer was due on August 22, 2025. Appellant moves for an order extending the timeline for the time to file an answer to respondent's motion

for discretionary review of decision terminating review.

Appellant's answer was filed two minutes late on the due date. Good cause exists because our answer was intended to be filed on time, my paralegal and I confirmed that our login worked on the due date early so that we would not have a login issue. However, in the process of fixing technicalities in the Answer, my direction to the paralegal caused a two-minute delay in filing the Answer. Even though it was technically late, we ask the court to grant a motion extending time to file in service of an accurate answer, free from typographical errors and pagination inconsistencies.

### **C. CONCLUSION**

Given the foregoing, the appellant respectfully requests that this court grant an extension of time of two minutes to the August 22, 2025 end of business

day deadline and accept the answer in the court record showing the answer filed on August 25, 2025.

DATED this 26th day of August 2025. Signed in Lake Oswego, OR.

This document contains 302 words.

Respectfully submitted,



Signer ID: 2KH3EEFAM15...

Collin C. McKean, WSBA #42261  
Attorneys for Appellant  
McKean Smith  
655 W. Columbia Way, Ste. 504  
Vancouver, WA 98660  
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CERTIFICATE OF SERVICE

I, Collin C. McKean, a person over 18 years of age,  
declare under penalty of perjury under the laws of the State of  
Washington that on August 26, 2025 I electronically filed the  
APPELLANT’S MOTION FOR EXTENTION OF TIME TO  
FILE ANSWER TO RESPONDENT’S MOTION FOR  
DISCRETIONARY REVIEW OF DECISION  
TERMINATING REVIEW with the clerk of the court using the  
electronic filing system, which will send a copy to the  
following electronic participant: Sean M. Downs,  
sean@greccodowns.com, attorney for Respondent, Jennifer  
Ashley Reedal.

Signed this 26th of August 2025. Signed in Lake  
Oswego, OR.



Signer ID: 2KH3EEAM15  
Collin C. McKean, WSBA #42261  
Attorney for Appellant  
McKean Smith  
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**MCKEAN SMITH LLC**

**August 26, 2025 - 3:36 PM**

**Transmittal Information**

**Filed with Court:** Supreme Court  
**Appellate Court Case Number:** 104,370-8  
**Appellate Court Case Title:** Jennifer Ashley Reedal v. Adnan Ali Khaki  
**Superior Court Case Number:** 24-2-07223-7

**The following documents have been uploaded:**

- 1043708\_Motion\_20250826153458SC387352\_1330.pdf  
This File Contains:  
Motion 1 - Extend Time to File  
*The Original File Name was 20250826MOET.pdf*

**A copy of the uploaded files will be sent to:**

- holly@mckeansmithlaw.com
- sean@greccodowns.com

**Comments:**

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Sender Name: Collin McKean - Email: collin@mckeansmithlaw.com

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**Note: The Filing Id is 20250826153458SC387352**