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SUPREME COURT
STATE OF WASHINGTON
2013 OCT 22 A.M. 12:12

IN THE SUPREME COURT
OF THE STATE OF WASHINGTON
BY RONALD LAVERNE GATES

<p>RONALD LAVERNE GATES Clerk Respondent</p> <p>KYON CHA BRUNDAGE Appellant.</p>	<p>No. 89265-2</p> <p>REPLY TO ANSWER TO MOTION FOR EXTENSION OF TIME TO FILE PETITION FOR DISCRETIONARY REVIEW</p> <p>Division II Case No. 43574- 8-II</p> <p>Lewis County Superior Court No. 11-3-00226-0</p>
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Pursuant to Rule of Appellate Procedure (“RAP”)

17.4(e), Appellant on appeal, Kyon Brundage, brings the instant Reply to Mr. Gates’ Answer to Motion for Extension of Time to File Petition for Discretionary Review.

The only issue on the table is whether Ms. Brundage should be granted an extension of time to file her Petition for Discretionary Review. Ms. Brundage is asking for only a one-day extension of time; three days, if you count the weekend, due to the fact that the power went out during a humongous thunderstorm, a natural disaster, which prevented her from completing her papers on time.

Any discussion of Lis Pendens is not only irrelevant, but premature, in that Mr. Gates did not file his Motion for Order Directing Cancellation of Lis Pendens until October 11, 2013 in Lewis County Superior Court and it is not scheduled to be heard until October 25, 2013.

Ms. Brundage has hired an attorney to respond to that

motion and he filed his Notice of Appearance on
October 18, 2013.

Mr. Gates' health is not relevant as to whether Ms.
Brundage's Motion for Extension of Time should be
granted. However, it is important to note that Mr. Gates
never presented any documentation of his health in the
trial court and he has not done it here.

Mr. Gates' debts are not relevant as to whether Ms.
Brundage's Motion for Extension of Time should be
granted.

The fact that Ms. Brundage was found in contempt in
the trial court is irrelevant as to whether this Court

should grant her Motion for Extension of Time.

Ms. Brundage was found in contempt on October 5, 2012 for failure to pay \$6500 in attorney's fees.

Clayton Dickinson was her attorney. He submitted her Financial Declaration proving she did not have the money to pay the attorney's fees. He was so certain that the court would understand that she did not have the money that he appeared by phone from his office in Tacoma. Judge Hunt found her in contempt anyway.

As Ms. Brundage points out in her Statement of the Case in her Petition for Discretionary Review, this whole case revolves around the fact that she had to represent herself against a real attorney at trial because

the trial court judge refused to grant her a two-week continuance. So Mr. Gates' attorney was able to keep anything favorable about Ms. Brundage out of the record and anything unfavorable about Mr. Gates out of the record.

Argument

Ms. Brundage has filed her Petition for Discretionary Review because she was denied her day in court at trial. Allegations about her squandering or misappropriating funds were never fairly litigated because she did not have an attorney on her side to represent her at trial.

Conclusion

This whole case revolves around the fact that Ms. Brundage was denied a fair trial because she had to represent herself against a real attorney because the trial court judge refused to grant her a two-week continuance. So all those allegations about a pattern of financial devastation of Gates, Ms. Brundage's intransigence, and Mr. Gates' failing health are the result of whatever Mr. Gates' attorney said they were because Ms. Brundage has no legal training. She did not know how to make an opening argument. She did not know how to make an objection, nor did she know the rules of evidence. She did not know how to question witnesses. She did not know how to call witnesses. Ms. Brundage also has a hearing disability. English is her second language.

Mr. Gates' attorney was able to ask leading questions because Mrs. Brundage did not know how to object.

She submitted evidence that was inadmissible because Ms. Brundage did not know how to object.

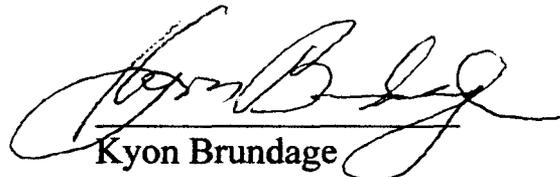
Ms. Brundage is asking for only a one-day extension of time; three days if you count the weekend.

Naturally, Mr. Gates does not want this Court to look at Ms. Brundage's Petition for Discretionary Review. He liked it when he had an attorney during the trial and Ms. Brundage had none. That is the way he would like to keep it.

Ms. Brundage would like to know when her Reply to

her Petition for Discretionary Review is due. She did not sign for the certified mail containing Mr. Gates' Answer and Response until October 17, 2013.

Respectfully submitted this 22nd day of October, 2013.

A handwritten signature in black ink, appearing to read 'Kyon Brundage', written over a horizontal line.

Kyon Brundage
Appellant, Pro Se
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