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SUPREME COURT  
STATE OF WASHINGTON  
May 28, 2014, 3:31 pm  
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No. 43983-2

E CRJ  
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IN THE SUPREME COURT  
OF THE STATE OF WASHINGTON

90054-0

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JOYCE KELLEY, Individually, Respondent

v.

PIERCE COUNTY, a county corporation, MARK SKAGREN & JANE  
DOE SKAGREN;

Petitioner.

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RESPONDENT'S ANSWER TO MOTION TO STRIKE OVER  
LENGTH ANSWER

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**LAW OFFICES OF THADDEUS P. MARTIN**

Thaddeus P. Martin, WSBA # 40442  
Of Attorneys for Respondent

4928 109<sup>th</sup> St. SW  
Lakewood, WA 98499  
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 ORIGINAL

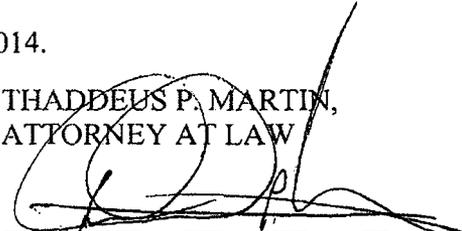
Respondent request that Appellant's Motion to Strike Over length Answer be denied and that this Court permit the additional 7 pages to Respondent's Answer. If this Court is not inclined to do this, then Respondent requests that the Court consider the first 20 pages of the Answer. Respondent's counsel could not meet the 20 page requirement due to the requirement to fully brief the facts and issues and the litigation history that has occurred thus far.

#### CONCLUSION

Respondent respectfully requests that this Court permit the additional 7 pages on this late Answer and deny Appellant's motion.

DATED this 28<sup>th</sup> day of May, 2014.

THADDEUS P. MARTIN,  
ATTORNEY AT LAW



Thaddeus P. Martin, WSBA # 28175

**CERTIFICATE OF SERVICE**

I hereby certify that I am not a party to this action and that I placed for service, via email, followed by legal messenger, of the foregoing document on the following parties in the following manner(s):

Daniel Hamilton  
Pierce County Prosecutor's Office  
Civil Division  
955 Tacoma Avenue S, Ste 301  
Tacoma, WA 98402

Christopher Key  
Johnson, Graffe, Keay, Moniz & Wick  
2115 N. 30<sup>th</sup>, Ste 101  
Tacoma, WA 98403

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Executed at Lakewood, Washington on the 28<sup>th</sup> day of May, 2014.

  
Kara Denny, Legal Assistant

## OFFICE RECEPTIONIST, CLERK

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**To:** Kara Denny  
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**Subject:** 43983-2-Kelley v. Pierce County

To Whom It May Concern:

Please file the attached Respondent's Answer to Motion to Strike Over Length Answers. Please confirm once completed.

Thank you,  
Kara

KARA DENNY, LEGAL ASSISTANT  
THE LAW OFFICES OF THADDEUS P. MARTIN  
*Protecting the rights of people who've been wronged*

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