# FILED SUPREME COURT STATE OF WASHINGTON 4/1/2019 4:05 PM BY SUSAN L. CARLSON CLERK

### SUPREME COURT NO. 96655-9

# STATE OF WASHINGTON SUPREME COURT

COA No. 76576-1-I

GREAT OCEAN CAPITAL HOLDING, LLC, a Washington limited liability Company; HUY YING CHEN and XUE PING WANG, Husband and Wife Residing in Washington State;

# Appellant,

v.

YANLU LIU and AI HUA PAN, Husband and Wife Residing in King County, Washington; PENG ZHANG and ZHONGYUAN PAN, Husband and Wife Residing in Ontario, Canada,

# Respondent

PETIOTIONER MOTION FOR EXTENTION OF TIME FOR SUPREME COURT ACCEPT UNTIMELY WITH EXPLANATION ANSWER RESPONDENT RESPONSE PETITIONER DISCREPTION REVIEW

PRO SE for Two of Appellant CHEN HUY YING 5112 189<sup>th</sup> Ave NE Sammamish, WA 98074

Phone: (206) 779-8880

Email: capt.chen@goshipline.com

Pursuant to RAP 13.4 (d) provide that a reply to the answer must be filed within 15 days after the service on the party of the answer. The Respondents' answer was filed in Supreme Court on January 9, 2019 and service on Mr. Chen electronically on that date, therefore, the Petitioner's reply untimely and has been rejected for filing by this Court.

Petitioner wish to have the Court consider his answer of this filed motion for extension of time with explanations why the reply was filed late.

It is correctly that February 7, 2019 that petitioner received Respondent Counsels answer by combination of Plaintiffs Counsel Ms. Courtney Bhatt and Mr. James Ware together for "Respondents' Response in Opposition to Petitioner Huy Ying Chen and Xue Ping Wang's Petitioner for Discretionary Review."

On February 25,2019, Petitioners file a new "Motion to Disqualify Respondent Counsels Due to Not Clean Hand and Strike Respondents Answer to Petitioners for Description Review".

On March 5, 2019, Respondents' Response in Opposition to Petitioner Huy Ying Chen and Xue Ping Wang's Motion to Disqualify Counsel and Strike Respondent's Answer to Petitioner for Review"

On March 12,2019, Petitioners Response Respondent's Answered to Petitioner's Motion to Disqualify Counsel and Strike Respondent's Answer to Petitioner for Review"

Since Petitioners' have answered for Petitioners' Discretionary Review and waiting for a new petition review for disqualify Plaintiff Counsel and strike Respondents answer to Petitioners' discretionary review until now, which cause of delay in answering Respondents answer for Petitioners' Discretionary Review. With above Good cause exists for delay answer with sincerely ask this Court extend time for answer Respondent answer for discretionary review and not reject to accept petitioner answering for Respondents answer Petitioner discretionary review.

For reasons above, Petitioners' respectfully request that this motion to extension "petitioner answering for Respondents answer Petitioner discretionary review "be granted and accept until Petitioner response at March 29, 2019.

Dated: April 1, 2019

By : CHÉN HUY YING

as Pro Se

# ANDREA CHEN - FILING PRO SE

# April 01, 2019 - 4:05 PM

# Filing Motion for Discretionary Review of Court of Appeals

# **Transmittal Information**

**Filed with Court:** Supreme Court **Appellate Court Case Number:** Case Initiation

**Appellate Court Case Title:** Yanlu Liu, et al, Respondents v. Great Ocean Capital Holding, LLC, et al,

Appellants (765761)

# The following documents have been uploaded:

• DCA\_Motion\_20190401160219SC159029\_5624.pdf

This File Contains:

Motion 1 - Extend Time to File

The Original File Name was 04-01-2019 Motion extention answer for review - MDK.pdf

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

- cbhatt@mdklaw.com
- hy@nobo.us
- jware@mdklaw.com
- tos@tuellasykeslaw.com

### **Comments:**

Sender Name: Andrea Chen - Email: andrea@nobo.us

Address:

5112 189th Avenue NE Sammamish, WA, 98074 Phone: (206) 973-3919

Note: The Filing Id is 20190401160219SC159029