FILED
SUPREME COURT
STATE OF WASHINGTON
1/16/2019 11:22 AM
BY SUSAN L. CARLSON
CLERK

IN THE SUPREME COURT FOR THE STATE OF WASHINGTON

STATE OF WASHINGTON,) Supreme Court No: (not yet assigned)) Court of Appeals No. 49794-8-II
Respondent,) Pierce Co No. 13-1-02553-3
VS.) MOTION FOR EXTENSION OF TIME) FOR FILING PETITION FOR REVIEW
WILLIAM ALVAREZ-CALO,)
Petitioner.))
	

- Identity of Moving Party, Attorney Lisa E. Tabbut, on behalf of
 WILLIAM ALVAREZ-CALO, Petitioner, asks for the relief designated in Part 2.
- 2. Statement of Relief Sought. Petitioner seeks an additional 30 days past the due date of January 28, 2019, to file his Petition for Review.
- 3. Facts Relevant to Motion. The Court of Appeals issued its 61 page opinion on December 27, 2018. I was appointed to represent Mr. Alvarez-Calo, who is indigent, on appeal through the issuance of the Court of Appeals' opinion. I do not intend to file a Petition for Review on his behalf. Instead, Mr. Alvarez-Calo is working on filing the petition.

Mr. Alvarez-Calo is serving a long sentence and is incarcerated at Washington State Penitentiary. His access to the law library is limited. Mr. Alvarez-Calo requests MOTION FOR EXTENSION OF TIME FOR FILING PETITION FOR REVIEW - 1 -

additional time to file the Petition for Review. I assured him I would make the request for an extension to this court on his behalf.

4. Grounds for Relief Sought. Granting this motion will assure that Mr. Alvarez-Calo will have adequate time to prepare and file his petition for review and receive the full complement of his appellate rights.

Dated January 16, 2019.

Respectfully submitted,

LISA E. TABBUT, WSBA #21344

Attorney at Law

DECLARATION OF SERVICE

Lisa E. Tabbut declares:

On today's date, I efiled this document to (1) the Supreme Court; and (2) Pierce County Prosecutor's Office at pcpatcecf@co.pierce.wa.us and (3) mailed to William Alvarez-Calo, DOC#395946, Washington State Penitentiary, 1313 North 13th Avenue, Walla Walla, WA 99362.

I CERTIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.

Signed January 16, 2019, in Winthrop, Washington.

Lisa E. Tabbut, WSBA No. 21344

Attorney at Law P.O. Box 1319 Winthrop, WA 98862 (509) 996-3959 Itabbutlaw@gmail.com

MOTION FOR EXTENSION OF TIME FOR FILING PETITION FOR REVIEW - 2 -

LAW OFFICE OF LISA E TABBUT

January 16, 2019 - 11:22 AM

Filing Petition for Review

Transmittal Information

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

Appellate Court Case Title: State of Washington, Respondent v. William Alvarez-Calo, Appellant (497948)

The following documents have been uploaded:

• PRV_Petition_for_Review_Plus_20190116112151SC724126_2644.pdf

This File Contains:

Motion 1 - Extend Time to File

Petition for Review

The Original File Name was William Alvarez-Calo Motion for Extension to File Petition for Review PFR FINAL.pdf

A copy of the uploaded files will be sent to:

• PCpatcecf@co.pierce.wa.us

• jason.ruyf@piercecountywa.gov

Comments:

Sender Name: Valerie Greenup - Email: valerie.lisatabbut@gmail.com

Filing on Behalf of: Lisa Elizabeth Tabbut - Email: ltabbutlaw@gmail.com (Alternate Email:

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