

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

MATTHEW & STEPHANIE)	No. 84362-7
McCLEARY, et al.,)	
Respondents)	
)	
v.)	MOTION TO ACCEPT OVERLENGTH
)	BRIEF FOR FILING THIS DATE
STATE OF WASHINGTON,)	
Appellant.)	

A. IDENTITY OF MOVING PARTY

Amicus curiae Washington's Paramount Duty (WPD) is a grassroots, non-profit advocacy organization with a single mission: to compel Washington to amply fund basic education. This Court has granted WPD's motion to file an amicus. *Amicus curiae* WPD, by and through undersigned counsel, respectfully asks this Court to grant the relief requested in section B.

B. STATEMENT OF RELIEF SOUGHT

Pursuant to RAP 10.6(a) and (b), RAP 1.2(a), and RAP 18.8, Washington's Paramount Duty respectfully asks permission to file a 22-page amicus brief, which is 2 pages over the 20-page brief allowed by RAP 10.6.

C. FACTS RELEVANT TO MOTION

The subject of this case and the complexity of the issues have been briefed by the parties and other *amicus*. The issues involve the State's contempt of Court, separation of powers, and the interpretation of our state's constitution.

D. GROUND FOR RELIEF AND ARGUMENT

THE COURT SHOULD ALLOW THE FILING OF THE OVERLENGTH
PLEADING AS OF THIS DATE

RAP 10.4(b) provides that "[f]or compelling reasons the court may grant a motion to file an over-length brief." The additional pages of briefing are necessary to assist the Court with the significant issues raised by this case.

E. CONCLUSION

This Court should grant the motion to allow WPD to file an overlength amicus brief in this case. That brief is filed herewith.

DATED this 30th day of August, 2017.

Respectfully submitted,

/s/ Summer Stinson

SUMMER STINSON, WSBA No. 40059
Board Member and Counsel *pro bono* for
Amicus Washington's Paramount Duty
311 NW 74th Street
Seattle, WA. 98117
(206) 239-8504

/s/Kathryn A. Russell Selk

KATHRYN RUSSELL SELK, No. 23879
Appointed counsel for Appellant
RUSSELL SELK LAW OFFICE
1037 Northeast 65th Street, Box 176
Seattle, Washington 98115
(206) 782-3353

CERTIFICATE OF SERVICE BY EFILING/ELECTRONIC MAIL

Under penalty of perjury under the laws of the State of Washington, I hereby declare that I sent a true and correct copy of the attached Amicus Brief via electronic mail (per agreement by the below) upon the following:

Thomas Fitzgerald Ahearne

ahearne@foster.com

Christopher Glenn Emch

emchc@foster.com

Adrian Urquhart Winder

winder@foster.com

Robert W. Ferguson

judyg@atg.wa.gov

David A. Stoler

daves@atg.wa.gov

Alan D. Copsey

alanc@atg.wa.gov

DATED this 30th day of August, 2017.

/s/ Kathryn A. Russell Selk

KATHRYN RUSSELL SELK, WSBA No. 23879

Counsel *pro bono* for

Amicus Washington's Paramount Duty

RUSSELL SELK LAW OFFICE

1037 Northeast 65th St. #176

Seattle, Washington 98115

(206) 782-3353

RUSSELL SELK LAW OFFICE

August 30, 2017 - 4:47 PM

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: 84362-7
Appellate Court Case Title: MATHEW & STEPHANIE MCCLEARY ET AL VS STATE OF WASHINGTON
Superior Court Case Number: 07-2-02323-2

The following documents have been uploaded:

- 843627_Motion_20170830164643SC213729_8458.pdf
This File Contains:
Motion 1 - Overlength Brief
The Original File Name was McClearymtnover.pdf

A copy of the uploaded files will be sent to:

- EduLitigation@ATG.WA.GOV
- KARSdroit@aol.com
- adrian.winder@foster.com
- ahearne@foster.com
- alanc@atg.wa.gov
- buzz@pfrwa.com
- canderson@perkinscoie.com
- cdainsberg@ij.org
- cdejulio@perkinscoie.com
- chris.emch@foster.com
- cindy.bourne@pacificallawgroup.com
- cjones@joneslegalgroup.net
- daves@atg.wa.gov
- david.keenan@kingcounty.gov
- dawn.taylor@pacificallawgroup.com
- dscaramastra@gsblaw.com
- emaffeo@pseofwa.org
- gabrielle.thompson@klgates.com
- grace.yuan@klgates.com
- gwiens@mickesotoole.com
- hcassubhai@spiroharrison.com
- hstrasberg@comcast.net
- hstrasberg@me.com
- jamie.lisagor@pacificallawgroup.com
- jasonmackay@hotmail.com
- jmackay@pseofwa.org
- john.bjorkman@klgates.com
- kathleen@pfrwa.com
- kathy@johnstongeorge.com
- lee.marchisio@foster.com
- litdocket@foster.com
- mary.vancleve@columbialegal.org

- matthew.segal@pacificallawgroup.com
- mbindas@ij.org
- michael.althausen@columbialegal.org
- paul.lawrence@pacificallawgroup.com
- rmckenna@orrick.com
- sarahadunne@yahoo.com
- scot@johnstongeorge.com
- sea_wa_appellatefilings@orrick.com
- sgoolyef@atg.wa.gov
- spencer.coates@foster.com
- summerstinson@gmail.com
- talner@aclu-wa.org
- valerie.kathrynrussellselk@gmail.com
- vhughes@perkinscoie.com
- wbcollins@comcast.net

Comments:

Sender Name: Kathryn Selk - Email: KARSDroit@aol.com

Address:

1037 NE 65TH ST

SEATTLE, WA, 98115-6655

Phone: 206-782-3353

Note: The Filing Id is 20170830164643SC213729