

No. 73725-2-1

**IN THE COURT OF APPEALS, DIVISION I
OF THE STATE OF WASHINGTON**

SUSAN CORLISS,

Appellant,

vs.

**ADMIRAL'S COVE BEACH
CLUB, et al. and ROBERT
WILBUR,**

Respondents.

**RESPONDENT
ROBERT WILBUR'S
MOTION FOR
EXTENSION OF
TIME TO FILE BRIEF**

Respondent Robert Wilbur by and through his attorney of record, Christon C. Skinner, moves the court for an extension of time for the filing of the Brief of Respondent Robert Wilbur from February 24, 2016 to March 15, 2016. Respondent Wilbur has not previously requested an extension of time to file the brief.

This motion is made upon the ground that counsel for Respondent, Robert Wilbur requires additional time to prepare the Respondent's brief for the reasons set forth in the attached declaration.

Signed this 18th day of February, 2016.



Christon C. Skinner, WSBA # 9515
Attorney for Respondent Wilbur
Law Offices of Christon C. Skinner
791 SE Barrington Drive
Oak Harbor WA 98277
360-679-1240

DECLARATION

I am the attorney for Respondent Robert Wilbur in this appeal and make this declaration in support of the respondent's motion for extension of time to file a responsive brief.

No previous requests have been made for an extension of time to prepare the Respondent, Wilbur's brief. Because of my current caseload and my spouse's recent need to undergo spinal surgery and related follow up procedures, I have not been able to devote sufficient time to the preparation of Mr. Wilbur's responsive brief in this matter. My wife had surgery on her spine in November of 2015. The surgery took place in Seattle although we reside 90 miles away. The surgery was not successful and I have been required to transport her to and from our home for follow-up visits

and further diagnostics on several occasions. On the date that I am submitting this motion, my spouse is scheduled to undergo a four hour, diagnostic procedure in Seattle. I am transporting her to the hospital from our home in Oak Harbor for that procedure and will be out of the office until February 22, 2016 in connection with my obligation to assist her. In addition, I have been required to take some time out of the office to assist my spouse during the period of her recovery. Not surprisingly, the time away from the office has created a backlog in my caseload. I recently hired another associate in my firm to assist with my caseload but he is not sufficiently familiar with the issues in this appeal to adequately prepare the responsive brief in my stead.

The Respondent's brief is due on February 24, 2016. I am requesting an extension of time of approximately 20 days to March 15, 2016 to prepare and file the Respondent, Wilbur's, brief. Under penalty of perjury under the laws of the State of Washington, I certify the foregoing to be true and correct.

Dated this 18th day of February, 2016.



Christon C. Skinner, WSBA # 9515

DECLARATION OF SERVICE

The undersigned certifies under penalty of perjury under the laws of the State of Washington that on the 18th day of February, 2016, in the manner indicated below, I caused delivery of copies of the following documents:

Motion for Extension of Time to File Brief of Respondent Robert Wilbur

To:

Attorney for Appellant:

Jay Carlson
Carlson Legal
315 Fifth Ave. S., Ste 860
Seattle WA 98104

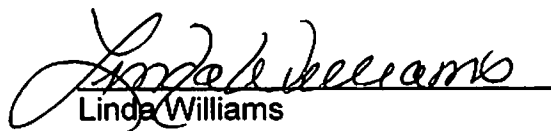
- Personal Service
- U.S. Mail
- Certified Mail
- Overnight Mail
- Fax # (206) 260-2486
- E-service
- E-mail:
 - jaycarlson.legal@gmail.com;
 - jay@carlsonlegal.org;
 - josephdmartinez@gmail.com

Attorney for Respondent
Admiral's Cove Beach Club:

Marilee C. Erickson
Christopher Nye
Reed McClure Attorneys at Law
1215 Fourth Avenue, Suite 1700
Seattle, WA 98161-1087

- Personal Service
- U.S. Mail
- Certified Mail
- Overnight Mail
- Fax # (206) 223-0152
- E-service
- E-mail: merickson@rmlaw.com;
- cnye@rmlaw.com;
- rlewis@rmlaw.com

Signed this 18th day of February, 2016 at Oak Harbor, WA.


Linda Williams