

FILED  
SUPREME COURT  
STATE OF WASHINGTON  
11/28/2023 1:41 PM  
BY ERIN L. LENNON  
CLERK

No. 102581-5

SUPREME COURT OF THE STATE OF WASHINGTON

---

WASHINGTON ELECTION INTEGRITY COALITION  
UNITED, a Washington State Nonprofit

Appellant,

v.

CHANDRA SCHUMACHER, Lincoln County Auditor,  
LINCOLN COUNTY, and WASHINGTON STATE  
DEMOCRATIC CENTRAL COMMITTEE,

Respondents, and

JERRY SCHULZ, Plaintiff and DOES 1-30

---

WASHINGTON ELECTION INTEGRITY COALITION  
UNITED, a Washington State Nonprofit

Appellant,

v.

MATTHEW BEATON, Franklin County Auditor, and  
FRANKLIN COUNTY,

Respondent.

---

ON PETITION FOR REVIEW FROM COURT OF APPEALS,  
DIVISION III

---

**RESPONDENT FRANKLIN COUNTY'S MOTION FOR  
EXTENSION OF TIME TO FILE ANSWER TO  
PETITION**

---

Callie A. Castillo, WSBA No. 38214  
Erika O'Sullivan, WSBA No. 57556  
LANE POWELL PC  
1420 Fifth Avenue, Suite 4200  
P.O. Box 91302  
Seattle, Washington 98111-9402  
Telephone: 206.223.7000  
Facsimile: 206.223.7107  
*Attorneys for Defendants-  
Respondents Franklin County*

## RELIEF REQUESTED

**A. Identity of Moving Party.** Respondent Franklin County respectfully moves for the relief set forth below.

**B. Statement of Relief Requested.** Franklin County moves for a 30-day extension of time to file its Answer to Appellant Washington Election Integrity Coalition United's Petition for Review from December 20, 2023, to January 19, 2024.

**C. Grounds for Relief Requested.** Under RAP 18.8, this Court may extend the time in which an act must be done to serve the ends of justice. *See* RAP 18.8(a). Franklin County's Answer is currently due December 20, 2023. Counsel has pre-existing court deadlines, including the filing of two other appellate briefs, and Counsel and Respondent both have personal commitments over the holidays. An additional 30 days will ensure that counsel has sufficient time to prepare a thorough and helpful brief for the Court. Counsel for Appellant, Respondent Lincoln County, and Intervenor-Respondent Washington State

Democratic Central Committee were contacted on November 27, 2023. Lincoln County and the Washington State Democratic Central Committee did not oppose the request for an extension; Counsel for WEiCU indicated they did oppose the request.

**D. Conclusion.** For the reasons set forth above, good cause exists for an extension of time from December 20, 2023, to January 19, 2024, for the filing of Franklin County’s Answer. Franklin County asks that the Court grant the extension, applying the same deadline for all Respondents to answer accordingly.

CERTIFICATE OF COMPLIANCE

I certify that this memorandum contains 231 words in compliance with RAP 18.17.

////  
////  
////  
////  
////  
////

Respectfully submitted November 28, 2023,

LANE POWELL PC

*By: s/Callie A. Castillo*

Callie A. Castillo, WSBA No. 38214

Erika O'Sullivan, WSBA No. 57556

1420 Fifth Avenue, Suite 4200

P.O. Box 91302

Seattle, Washington 98111-9402

castilloc@lanepowell.com

osullivane@lanepowell.com

*Attorneys for Franklin County*

*Defendants-Respondents*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 28, 2023, I caused to be served a copy of the foregoing document to be delivered in the manner indicated below to the following person at the following address:

Virginia P. Shogren Virginia P Shogren, P.C. 961 W. Oak Court Sequim, WA 98382 <a href="mailto:vshogren@gmail.com">vshogren@gmail.com</a> <i>Attorney for Appellant WEiCU</i>	<input checked="" type="checkbox"/> by <b>JIS/ECF</b> <input checked="" type="checkbox"/> by <b>Electronic Mail</b> <input type="checkbox"/> by <b>U.S. First-Class Mail</b> <input type="checkbox"/> by <b>Hand Delivery</b> <input type="checkbox"/> by <b>Overnight Delivery</b>
Kevin J. Hamilton Reina Alece Almon-Griffin Amanda J. Beane Perkins Coie LLP 1201 3 <sup>rd</sup> Avenue, Suite 4900 Seattle, WA 98101-3095 <a href="mailto:khamilton@perkinscoie.com">khamilton@perkinscoie.com</a> <a href="mailto:RAlmon-Griffin@perkinscoie.com">RAlmon-Griffin@perkinscoie.com</a> <a href="mailto:abeane@perkinscoie.com">abeane@perkinscoie.com</a> <i>Attorneys for Intervenor</i>	<input checked="" type="checkbox"/> by <b>JIS/ECF</b> <input checked="" type="checkbox"/> by <b>Electronic Mail</b> <input type="checkbox"/> by <b>U.S. First-Class Mail</b> <input type="checkbox"/> by <b>Hand Delivery</b> <input type="checkbox"/> by <b>Overnight Delivery</b>
Paul J. Triesch Keating, Bucklin & McCormack, Inc., P.S. 801 2 <sup>nd</sup> Avenue, Suite 1210 Seattle, WA 98104-1518 <a href="mailto:ptriesch@kbmlawyers.com">ptriesch@kbmlawyers.com</a> <i>Attorney for Lincoln County Respondents</i>	<input checked="" type="checkbox"/> by <b>JIS/ECF</b> <input checked="" type="checkbox"/> by <b>Electronic Mail</b> <input type="checkbox"/> by <b>U.S. First-Class Mail</b> <input type="checkbox"/> by <b>Hand Delivery</b> <input type="checkbox"/> by <b>Overnight Delivery</b>

DATED: November 28, 2023

s/Angela Craig  
Angela Craig



# LANE POWELL PC

November 28, 2023 - 1:41 PM

## Transmittal Information

**Filed with Court:** Supreme Court  
**Appellate Court Case Number:** 102,581-5  
**Appellate Court Case Title:** WA Election Integrity Coalition United, et al. v. Chandra Schumacher, et al.  
**Superior Court Case Number:** 21-2-00042-5

### The following documents have been uploaded:

- 1025815\_Motion\_20231128134026SC126944\_6412.pdf  
This File Contains:  
Motion 1 - Extend Time to File  
*The Original File Name was Franklin Motion for Extension to Respond.pdf*

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

- RAlmon-Griffin@perkinscoie.com
- abeane@perkinscoie.com
- hhyatt@perkinscoie.com
- jhernandez@perkinscoie.com
- khamilton@perkinscoie.com
- lmartin@kbmlawyers.com
- mlyles@perkinscoie.com
- osullivan@lanepowell.com
- ptriesch@kbmlawyers.com
- vshogren@gmail.com

### Comments:

---

Sender Name: Angela Craig - Email: craiga@lanepowell.com

**Filing on Behalf of:** Callie Anne Castillo - Email: castilloc@lanepowell.com (Alternate Email: )

Address:  
1420 Fifth Avenue  
Suite 4200  
Seattle, WA, 98101  
Phone: (206) 223-7741

**Note: The Filing Id is 20231128134026SC126944**