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10

11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF WASHINGTON

13 ELF-MAN, LLC,

No. 2:13-CV-00395-TOR

14 vs.

MOTION TO EXTEND TIME
TO RESPOND TO MOTION TO
INTERVENE (ECF 114) AND
MOTION TO UNSEAL (ECF 116)

15 RYAN LAMBERSON,

Note on Motion Calendar: 12/15/2017

6:30 P.M. - Without Oral Argument

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17
18 The undersigned counsel respectfully moves the Court for an extension of time to
19 respond to the Center For Justice’s Motion to Intervene for the Limited Purpose of
20 Challenging the Sealing of Court Records (ECF 114) and Intervenor Center For Justice’s
21 Motion to Unseal Exhibits (ECF 116).
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1 The undersigned counsel appeared in this case on behalf of Maureen C.
2 VanderMay and The VanderMay Law Firm (collectively, “VanderMay”) on August 1,
3 2014 (ECF 82). Defendant Lamberson had brought a motion for sanctions and fees
4 against Elf-Man, LLC and its former attorney, VanderMay. (ECF 80) The representation
5 of VanderMay was effectively completed on October 31, 2014 with the filing of Order
6 Re: Defendant’s Post-Dismissal Motions (ECF 99). That Order denied Defendant
7
8 Lamberson’s motions for sanctions against VanderMay. Id.
9

10 Winston & Cashatt, Lawyers was re-engaged today to represent VanderMay in
11 regards to the motions to intervene and to unseal filed by the Center for Justice
12 (“Motions”). The 14-day time period to respond to the Motions had already lapsed
13 before the decision was made to re-engage my firm as counsel for VanderMay.
14 LR 7.1(b)(2)(B)(1).
15

16 Maureen VanderMay has retired and has closed the VanderMay Law Firm.
17 VanderMay does not have ready access to the records the Center of Justice seeks to have
18 unsealed apart from access through the Court. VanderMay requests additional time from
19 the Court to obtain access to the documents at issue, review those documents, and submit
20 an informed response to the Court. VanderMay has reviewed the Motion to Extend Time
21 to Respond filed today on behalf of Elf-Man, LLC and joins in that motion’s request to
22

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1 extend the deadline to respond to January, 2018.

2 DATED this 15th day of November, 2017.

3 s/Collette C. Leland, WSBA No. 40686
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1 I hereby certify that on November 15, 2017, I electronically filed the foregoing
2 with the Clerk of the Court using the CM/ECF System which will send notification of
3 such filing to the following:
4

5 David Allen Lowe
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