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7 U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

8 ELF-MAN, LLC,

9 Plaintiff,

10 vs.

11 RYAN LAMBERSON, an individual,

12 Defendant.
13

NO: 2:13-cv-00395-TOR

**REPLY IN SUPPORT OF CENTER
FOR JUSTICE’S MOTIONS TO
INTERVENE AND UNSEAL
RECORDS**

Note on Motion Calendar: 11/30/17

14 **I. REPLY**

15 The Center for Justice (“CFJ”) respectfully requests that the Court grant its
16 Motions to Intervene (Dkt. No. 114) and to Unseal Records (Dkt. No. 116).

17 Plaintiff Elf-Man, LLC has not filed a response to the substance of CFJ’s
18 motions. Instead, David Lowe, Elf-Man’s former attorney who reports having had
19 no communication with Elf-Man since 2015, has asked for more time to respond
20 (purportedly on Elf-Man’s behalf). *See* Dkt. No. 121. In addition, non-party

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1 Maureen VanderMay—Elf-Man’s former attorney who withdrew several years
2 ago based on a conflict—has also asked the Court for additional time to respond.
3 *See* Dkt. No. 122.

4 Although CFJ does not believe Elf-Man should require additional time to
5 respond to motions that were filed three weeks ago, and CFJ is not familiar with
6 any legal theory that provides Ms. VanderMay the standing to respond to CFJ’s
7 motions, CFJ will consider the substance of these motions and file a timely
8 response on or before November 29.

9 **II. CONCLUSION**

10 Based on the foregoing, and the reasons set forth in CFJ’s opening briefs,
11 CFJ respectfully requests that this Court grant its motions without delay.

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13 RESPECTFULLY SUBMITTED AND DATED this 21st day of
14 November, 2017.

15 KIRK D. MILLER, P.S.

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17 By: /s/ Kirk D. Miller, WSBA #40025
18 Kirk D. Miller, WSBA #40025
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DATED this 21st day of November, 2017.

KIRK D. MILLER, P.S.

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