

FILED  
Court of Appeals  
Division II  
State of Washington  
10/10/2024 9:39 AM  
No. 58881-1-II

---

IN THE COURT OF APPEALS OF  
THE STATE OF WASHINGTON  
DIVISION II

---

SAVE THE DAVIS-MEEKER GARRY OAK,  
Appellant,

v.

DEBBIE SULLIVAN, in her capacity of Mayor of Tumwater,  
Respondent.

---

RESPONDENT MAYOR DEBBIE SULLIVAN'S  
OBJECTION TO MOTION FOR EXTENSION OF TIME

---

Jeffrey S. Myers, WSBA #16390  
Jakub Kocztorz, WSBA # 61393  
Law, Lyman, Daniel, Kamerrer &  
Bogdanovich, P.S.  
P.O. Box 11880  
Olympia, WA 98508  
T: (360) 754-3480  
F: (360) 357-3511  
Email: [jmyers@lldkb.com](mailto:jmyers@lldkb.com)

*Attorneys For Respondent*

## **OBJECTION TO MOTION FOR EXTENSION**

Respondent Debbie Sullivan objects to the motion for extension of time to file a corrected brief as directed by the Court's October 8, 2024 Ruling granting the Respondent's Motion to Strike. Having successfully sought accelerated review of this matter, Appellant should not be rewarded for violating basic rules requiring briefs to cite to the record by further delaying review, as their motion for an extension seeks. To do so would be inequitable given the fact that it was the Appellants who sought to accelerate this court's review, as provided in RAP 18.12. See Commissioner's Ruling, July 23, 2024.

The Court's October 8, 2024 Ruling generously granted Appellants the opportunity to file a brief that corrects their violations of RAP 10.3(a)(5) and (6) and properly cite to the record. Appellants seek to delay their deadline while seeking modification of that ruling, a clear delaying tactic. The court should instead require them to file their corrected brief, and if their motion to modify, which has not yet even been filed, is

granted, it could appropriate relief, including reinstatement of their original brief. This would avoid delay in an accelerated proceeding, which is being caused solely by Appellants' violation of rules requiring proper citation to the record.

I certify that this brief contains 209 words as determined by computer word count in conformity with RAP 18.17.

DATED this 10<sup>th</sup> day of October, 2024.

LAW, LYMAN, DANIEL,  
KAMERRER & BOGDANOVICH, P.S.



---

Jeffrey S. Myers, WSBA #16390  
Law, Lyman, Daniel, Kamerrer &  
Bogdanovich, P.S.  
P.O. Box 11880  
Olympia, WA 98508  
(360) 754-3480  
[jmyers@lldkb.com](mailto:jmyers@lldkb.com)

*Attorney for Respondent Debbie Sullivan*

## CERTIFICATE OF SERVICE

I hereby certify, under the penalty of perjury, under the laws of the State of Washington that I have caused a true and correct copy of the foregoing document all to be served to the below listed party by the Washington State Court of Appeals e-filing system as well as by electronic mail per service agreement upon the following person(s):

**Appellant's Attorneys:**

Ronda Larson Kramer  
LARSON LAW, PLLC  
P.O. Box 7337  
Olympia, WA 98507-7337  
[ronda@larsonlawpllc.com](mailto:ronda@larsonlawpllc.com)

Bryan J. Telegin  
Telegin Law PLLC  
175 Parfitt Way SW, Ste. N270  
Bainbridge Island, WA 98110  
[bryan@teleginlaw.com](mailto:bryan@teleginlaw.com)

DATED this 10<sup>th</sup> day of October, 2024.

*/s/ Lisa Gates*

\_\_\_\_\_  
Lisa Gates, Legal Asst.

**LAW LYMAN DANIEL KAMERRER & BOGDANOVICH**

**October 10, 2024 - 9:39 AM**

**Transmittal Information**

**Filed with Court:** Court of Appeals Division II  
**Appellate Court Case Number:** 58881-1  
**Appellate Court Case Title:** Save the Davis Meeker Garry Oak, Appellant v. Debbie Sullivan, Respondent  
**Superior Court Case Number:** 24-2-01895-3

**The following documents have been uploaded:**

- 588811\_Answer\_Reply\_to\_Motion\_20241010093903D2925336\_9600.pdf  
This File Contains:  
Answer/Reply to Motion - Objection  
*The Original File Name was Objection to Motion for Extension.pdf*

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

- bryan@teginlaw.com
- christopher.wright@atg.wa.gov
- jkocztorz@lldkb.com
- lisa@lldkb.com
- ronda@larsonlawpllc.com

**Comments:**

---

Sender Name: Lisa Gates - Email: lisa@lldkb.com

**Filing on Behalf of:** Jeffrey Scott Myers - Email: jmyers@lldkb.com (Alternate Email: lisa@lldkb.com )

Address:

P.O. Box 11880  
OLYMPIA, WA, 98508  
Phone: (360) 754-3480

**Note: The Filing Id is 20241010093903D2925336**