

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

KITSAP COUNTY, a political subdivision of
the State of Washington,

Respondent,

v.

KITSAP RIFLE AND REVOLVER CLUB, a
not-for-profit corporation registered in the
State of Washington, and JOHN DOES and
JANE DOES I-XX, inclusive,

Appellant,

and

IN THE MATTER OF NUISANCE AND
UNPERMITTED CONDITIONS LOCATED
AT

One 72-acre parcel identified by Kitsap
County Tax Parcel ID No. 362501-4-002-
1006 with street address 4900 Seabeck
Highway NW, Bremerton Washington.

Case No.: 43076-2-II

**APPELLANT'S MOTION FOR
ADDITIONAL TIME FOR ORAL
ARGUMENT**

requests 40 minutes of oral argument per side because this is a complex appeal involving at least seven distinct legal issues, numerous legal errors by the trial court, declaratory judgment and injunction remedies, and a voluminous appellate record. The parties have submitted over 200 pages of briefing on the merits, and their over-length briefs cite dozens of legal authorities. Given the complexity and importance of the case, it will be appropriate to expand the length of oral argument to ensure an adequate opportunity for each party to orally present its side of the appeal and respond to questions. Therefore, the Club respectfully requests 40 minutes of oral argument per side.

If the Court cannot accommodate 40 minutes oral argument per side on the scheduled date, June 26, 2014, the Club respectfully moves pursuant to RAP 11.3 for an order rescheduling oral argument to occur on a date that can accommodate 40 minutes oral argument per side for the reasons stated above.²

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division of the Court of Appeals will define by general order the amount of time each side is allowed for oral argument"). *See also*, Tegland, 3 Wash. Prac., Rules Practice RAP 11.4 (7th ed.) ("[RAP 11.4(a)] is largely self-explanatory and has never required interpretation in a reported opinion").

² *See* RAP 11.3 ("A request to reschedule oral argument must be made by motion filed within 15 days of receipt of the letter setting the date for oral argument, except upon a showing of good cause"). *See also*, Tegland, 1 Wash. Prac., Methods of Practice § 12:60 (4th ed.) ("[RAP 11.3] provides for a relatively informal means of scheduling oral argument and recognizes that rescheduling will sometimes be necessary").

CERTIFICATE OF FILING AND SERVICE

I, Shandra Rissmann, declare under penalty of perjury under the laws of the State of Washington, that I am now and at all times herein mentioned have been a resident of the State of Oregon, over the age of eighteen years, not a party to or interested in this cause of action, and competent to be a witness herein.

On the date stated below, copies of APPELLANT'S MOTION FOR ADDITIONAL TIME FOR ORAL ARGUMENT were electronically filed with Division II of the Washington Court of Appeals and served upon the following individuals by e-mail and U.S. Mail, postage prepaid, at Portland, Oregon:

Neil R. Wachter
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(Of Attorneys for Respondent Kitsap County)

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DATED: May 14, 2014.

CHENOWETH LAW GROUP, PC



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