

**STATE OF MICHIGAN  
IN THE COURT OF APPEALS**

TAMARA FILAS,

Plaintiff-Appellant,

Court of Appeals No: 317972

Circuit Court No: 13-000652-NI

-vs-

KEVIN THOMAS CULPERT, AND  
EFFICIENT DESIGN, INC., A Michigan  
Corporation.

Defendants-Appellees.

TAMARA FILAS Plaintiff-Appellant 6477 Edgewood Rd. Canton, MI 48187 (734) 751-0103 e-mail redacted	MICHAEL C. O'MALLEY (P59108) Attorney for Defendant Efficient Design Vandever Garzia 1450 W. Long Lake Rd., Suite 100 Troy, MI 48098 (248) 312-2940 <a href="mailto:momalley@vgpclaw.com">momalley@vgpclaw.com</a>
DREW W. BROADDUS (P64658) Attorney for Defendant Culpert Secrest Wardle 2600 Troy Center Drive, P.O. Box 5025 Troy, MI 48007-5025 (616) 272-7966 <a href="mailto:dbroaddus@secrestwardle.com">dbroaddus@secrestwardle.com</a>	JAMES C. WRIGHT (P67613) Attorney for Defendant Efficient Design Zausmer, Kaufman, August & Caldwell, P.C. 31700 Middlebelt Rd., Suite 150 Farmington Hills, MI 48334 (248) 851-4111 <a href="mailto:jwright@zkact.com">jwright@zkact.com</a>

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**PLAINTIFF-APPELLANT'S MOTION TO EXTEND TIME  
FOR FILING REPLY TO DEFENDANT-APPELLEE' EFFICIENT DESIGN, INC.'S  
ANSWER TO CO-DEFENDANT'S MOTION TO AFFIRM AND REQUEST FOR  
CONSISTENT RELIEF**

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Plaintiff-Appellant, Tamara Filas, moves this Honorable Court for a 21-day extension of time for filing Appellant's Reply to Defendant-Appellee' Efficient Design, Inc.'s Answer to Co-Defendant's Motion to Affirm and Request for Consistent Relief, stating as follows:

1. Tamara Filas, the undersigned, has filed this case pro se because she has not been able to find an attorney who will help her with the issue(s) argued in this case.
2. She also does not have an attorney representing her in the first-party no fault case, also before the Court of Appeals, which creates an additional burden.
3. She does not have an attorney for any other pending legal issues, including, but not limited to, her four appeals to the Teacher Tenure Commission, and other employment-related legal issues.
4. Tamara Filas is currently not working and her employment status is in dispute.
5. She is primarily dependent upon family for support.
6. Preparing a brief is a more difficult and arduous task for anyone who is not an attorney who does not have the staff assistance or the experience of an attorney to prepare unfamiliar legal filings, but for Ms. Filas it is even more difficult not only due to the extent and volume of her legal issues she has to attend to, created as a result of her auto accident, but because the normal pain and limitations she experiences as a result of her auto accident are exacerbated by the additional physical and mental work she has to perform to prepare numerous legal filings for ongoing auto accident issues and employment issues, all which have filing deadlines. All of this pressure, coupled with the physical and mental demands this legal work places upon her, negatively impacts Tamara

Filas's physical well-being and makes it difficult for her to keep up with medical appointments and other activities necessary to maintain her health.

7. Plaintiff-Appellant is therefore requesting an extension of 21 days to afford her the opportunity to submit an adequate reply to Defendant-Appellee Efficient Design Inc.'s Answer to Co-Defendant's Motion to Affirm and Request for Consistent Relief.
8. Appellee's Answer to Co-Defendant's Motion was served January 20, 2014, making Appellant's Reply to Appellee's Answer to Co-Defendant's Motion due on February 10, 2014 under MCR 7.211(B)(2)(a).
9. By this motion, the undersigned seeks a 21-day extension of time, from February 10, 2014, to March 3, 2014, due to other legal matters requiring immediate attention that prevented her Reply to Appellee's Answer to Co-Defendant's Motion from being completed within the existing briefing schedule.
10. The constant pressure and stress of having to prepare legal documentation since appealing to the Tenure Commission in September 2013 regarding issues with her employer, combined with her other legal issues, has made it extremely difficult to keep up. In particular, the undersigned was preparing the following legal documents in the weeks preceding the due date of her Reply to Appellee's Answer to Co-Defendant's Motion and/or is currently preparing them at this time:
  - a. Plaintiff-Appellant's Reply to Defendant-Appellee MEEMIC's Brief on Appeal Court of Appeals Case No. 316822, due 2-14-14.
  - b. Plaintiff-Appellant's Answer to Defendant-Appellee MEEMIC's Motion to Affirm, Court of Appeals Case No. 316822, due 2-6-14.
  - c. Preparing Answer to numerous charges filed against Plaintiff-Appellee by Dearborn Heights District No. 7. Statement about tenure charges delivered February 3, 2014 and attendance at Board meeting February 3, 2014, 7 p.m.



- d. Preparing informational packets for the Board of Education prior to February 3, 2014 Board meeting
  - e. Plaintiff-Appellant's Reply to Defendant-Appellee Thomas K. Culpert's Brief on Appeal, Court of Appeals Case No. 317972, due 1-30-14.
  - f. Plaintiff-Appellant's Answer to Defendant-Appellee Thomas K. Culpert's Motion to Affirm, Court of Appeals Case No. 317972, due 1-21-14.
  - g. Answer to Motion for Summary Disposition for Tamara Filas's Appeal #4 to the State Tenure Commission, due 1-17-14
  - h. Answer to Motion to Strike Amendment for Tamara Filas's Appeals #1-3 to the State Tenure Commission, due 1-17-14
  - i. Extensive letter mailed 12-30-13 to Providence Park Hospital and Medical Financial Solutions regarding erroneous billing of health care services.
  - j. Motion for Discovery in Tamara Filas's Appeal #4 to the State Tenure Commission, due 12-27-13.
  - k. Emergency Motion to Change venue of hearing for Tamara Filas's Appeals #1-3 to the State Tenure Commission, filed 12-16-13
  - l. Further exhibits submitted in Tamara Filas's Appeal to the State Tenure Commission, filed 12-16-13
  - m. Amendment to Tamara Filas's Appeal to the State Tenure Commission, filed 12-11-13.
  - n. Motion for Discovery in Tamara Filas's Appeals #1-3 to the State Tenure Commission, due 12-11-13.
  - o. Pending Open Meetings Act Case, Circuit Court case no. 13-015739-CZ, filed 12-6-13, that requires additional action.
  - p. Time needed to research health insurance under the Affordable Care Act since Appellant's private insurance was cancelled by BC/BS.
11. These legal matters have prevented the undersigned from being able to give her Reply to Appellee's Answer to Co-Defendant's Motion the time and attention it warrants within the existing schedule.

12. Plaintiff-Appellant, thus, respectfully seeks this additional time in order to complete and timely file her Reply to Appellee's Answer to Co-Defendant's Motion in this important matter, such that the due date for filing would be extended from February 10, 2014, to March 3, 2014.

WHEREFORE, Plaintiff-Appellant, Tamara Filas, respectfully requests this Court to extend by twenty-one (21) days the time for filing her Appellant's Reply to Defendant-Appellee' Efficient Design, Inc.'s Answer to Co-Defendant's Motion to Affirm and Request for Consistent Relief, to March 3, 2014.

Respectfully submitted,

Date 2-6-14

Tamara Filas  
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Signature  
redacted

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