

STATE OF MICHIGAN

SUPREME COURT

TAMARA FILAS,

Plaintiff-Appellant,

Supreme Court No. 151198

Court of Appeals No: 317972

Circuit Court No: 13-000652-NI

-vs-

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

Defendants-Appellees.

| | |
|---|--|
| <p>TAMARA FILAS Plaintiff-Appellant 6477 Edgewood Rd. Canton, MI 48187 (734) 751-0103 e-mail redacted</p> | <p>MICHAEL C. O'MALLEY (P59108) Attorney for Defendant Efficient Design Vandever Garzia 840 W. Long Lake Rd., Suite 600 Troy, MI 48098 (248) 312-2940 momalley@vgpclaw.com</p> |
| <p>DREW W. BROADDUS (P64658) Attorney for Defendant Culpert Secret Wardle 2600 Troy Center Drive, P.O. Box 5025 Troy, MI 48007-5025 (616) 272-7966 dbroaddus@secretwardle.com</p> | <p>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 jwright@zkact.com</p> |

**PLAINTIFF-APPELLANT'S MOTION TO EXTEND TIME FOR FILING
PL-AT'S REPLY TO DF-AE EFFICIENT DESIGN'S ANSWER
TO PL-AT'S APPLICATION FOR LEAVE TO APPEAL TO THE MSC**

Now comes Plaintiff-Appellant (“PL-AT”), Tamara Filas, requesting an extension of the time to file her Reply to DF-AE Efficient Design’s 3-30-15 Answer to PL-AT's Application for Leave to Appeal to the MSC.

1. PL-AT is filing *pro se*.
2. DF-AE Efficient Design's Answer to PL-AT's Application for Leave to Appeal to the MSC was served March 30, 2015, making PL-AT's Reply due April 20, 2015 under MCR 7.212(G).
3. By this motion, the undersigned seeks a 21-day extension of time, from April 20, 2015, to May 11, 2015, due to other legal matters requiring immediate attention that prevented her Reply to DF-AE Efficient Design's Answer to PL-AT's Application for Leave to Appeal from being completed within the existing briefing schedule.
4. 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 due to the extent and volume of the numerous other legal issues she has to attend to as a result of being in an auto accident in which she suffered personal injuries.
5. PL-AT's resources are limited and PL-AT has other lawsuits that require attention. In particular, the undersigned was preparing the following legal documents in the weeks preceding the due date of the aforementioned Reply and/or is currently preparing them at this time:
 - a. Reply to DF-AE Culpert’s Answer to PL-AT's Application for Leave to Appeal to the MSC, MSC Case No. 151198, filed 4-13-15.
 - b. Application for Leave to Appeal to the MSC for the 3-4-15 Opinion of the COA in COA Case No. 325172, filed 4-15-15, a deadline that was not extendable by motion.

- c. Application for Leave to Appeal to the MSC for the 3-10-15 Opinion of the COA in COA Case No. 317972, due 4-21-15, with a deadline that is not extendable by motion.
 - d. Reply to Defendant's Answer to Plaintiff's Motion to Clarify, Ingham County Circuit Court Case No. 14-692-CZ, filed 4-16-15.
 - e. Witness list for Ingham County Circuit Court Case No. 14-692-CZ, filed 4-16-15.
6. The aforementioned legal matters, in addition to other employment-related issues, have prevented the undersigned from being able to give her Reply to DF-AE Efficient Design's Answer to PL-AT's Application for Leave to Appeal the time and attention it warrants within the existing schedule.
 7. Because of the inaccurate history presented by the DF-AE Efficient Design, in its 31-page Brief, and the associated irrelevant and/or erroneous arguments, to adequately reply, it will require comprehensive responses from PL-AT, and a thorough analysis of past filings in the case in order to cite where the issues were preserved and argued previously, which is a time-consuming and tedious process.
 8. The erroneous information or statements made by the DF-AE will remain available in the public record for a considerable length of time, and could cause harm to Plaintiff and/or others who consider them as fact, if not addressed as untrue or rebutted by PL-AT in a Reply Brief.
 9. Plaintiff-Appellant, thus, respectfully seeks this additional time in order to complete and timely file her Reply to DF-AE Efficient Design's Answer to PL-AT's Application for Leave to Appeal in this important matter, such that the due date for filing would be extended from April 20, 2015, to May 11, 2015.

WHEREFORE, Plaintiff-Appellant, Tamara Filas, respectfully requests this Court to extend by twenty-one (21) days the time for filing her PL-AT's Reply to Defendant-Appellee' Efficient Design, Inc.'s Answer to PL-AT's Application for Leave to Appeal to the MSC, to May 11, 2015.

Thank you for your consideration of this Motion.

Respectfully submitted on 4-17-15,

signature redacted

Tamara Filas
6477 Edgewood
Canton, MI 48187
(734) 751-0103

e-mail redacted