

STATE OF MICHIGAN

SUPREME COURT

TAMARA FILAS,

Plaintiff-Appellant,

-vs-

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

Defendants-Appellees.

Supreme Court No. 151463

Court of Appeals No: 317972

Circuit Court No: 13-000652-NI

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 840 W. Long Lake Rd., Suite 600 Troy, MI 48098 (248) 312-2940 momalley@vgpclaw.com
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**PLAINTIFF-APPELLANT'S MOTION TO EXTEND TIME FOR FILING
PL-AT'S REPLY TO DF-AE KEVIN THOMAS CULPERT'S ANSWER
TO PL-AT'S APPLICATION FOR LEAVE TO APPEAL TO THE MSC**

Dated: May 14, 2015

Now comes Plaintiff-Appellant (“PL-AT”), Tamara Filas, requesting an extension of the time to file her Reply to DF-AE Kevin Thomas Culpert’s 4-28-15 Answer to PL-AT’s Application for Leave to Appeal to the MSC.

1. PL-AT is filing *pro se*.
2. DF-AE Kevin Thomas Culpert’s Answer to PL-AT’s Application for Leave to Appeal to the MSC was served April 28, 2015, making PL-AT’s Reply due May 19, 2015 under MCR 7.212(G).
3. By this motion, the undersigned seeks a 21-day extension of time, from May 19, 2015, to June 9, 2015, due to other legal, employment and personal obligations requiring immediate attention that are preventing her from completing her Reply to DF-AE Culpert’s Answer to PL-AT’s Application for Leave to Appeal 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 and employment issues she has to attend to as a result of being in an auto accident in which she suffered personal injuries.
5. Although Culpert’s 4-28-15 Answer in regard to PL-AT’s 4-21-15 MSC Application to Appeal the 3-10-15 COA Opinion (the instant case, No. 151463) appears similar to Culpert’s 3-23-15 Answer to PL-AT’s 3-10-15 MSC Application to Appeal the 11-25-14 COA Order (MSC Case No. 151198), it will require a completely different analysis since PL-AT’s two appeals are about dissimilar issues and each is in regard

- to a completely different decision of the COA. PL-AT's **4-21-15** MSC Application is only in regard to invalidating the **3-10-15 COA Opinion**.
6. DF-AE's 4-28-15 Answer to PL-AT's Application for Leave to the MSC is over 19 pages, and contains numerous false statements in regard to the history of the case, the events occurring at the 3-3-15 hearing on oral arguments, and past rulings on Culpert's prior Motions by the COA.
 7. Because of the inaccurate history presented by the DF-AE, 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 very time-consuming and tedious process for anyone to accomplish.
 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 Plaintiff does not have enough time to properly address them as untrue and/or rebut them in her Reply Brief.
 9. Plaintiff-Appellant, thus, respectfully seeks this additional time in order to complete and timely file her Reply to DF-AE Kevin Thomas Culpert'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 May 19, 2015, to June 9, 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

Kevin Thomas Culpert's Answer to PL-AT's Application for Leave to Appeal to the MSC, to
June 9, 2015.

Thank you for your consideration of this Motion.

Respectfully submitted on 5-14-15,

signature redacted

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