

BEFORE THE UNITED STATES SUPREME COURT

JOHN EARL ERICKSON AND
SHELLEY ANN ERICKSON,
Applicants-Prospective Petitioners,

v.

DEUTSCHE BANK NATIONAL TRUST COMPANY
AS TRUSTEE FOR LONG BEACH MORTGAGE LOAN
TRUST 2004-6,
Respondent.

DECLARATION OF WENDY ALISON NORA
IN SUPPORT OF EMERGENCY
APPLICATION FOR EXTENSION OF TIME TO FILE
PETITION FOR WRIT OF CERTIORARI UNDER
28 U.S.C. SEC. 1257(a) AND SUPREME COURT RULES 13.3
FROM AUGUST 2, 2022 TO OCTOBER 1, 2022
DUE TO EXTRAORDINARY CIRCUMSTANCES PURSUANT TO
SUPREME COURT RULE 13.5

Wendy Alison Nora declares, under penalty of perjury of the laws
of the United States of America, pursuant to 28 U.S.C. sec. 1746:

1. The facts set forth herein are true of her own personal
knowledge, except where stated upon information or belief and where
stated upon information or belief, she believes those statements to be true.
2. Exhibits A and B attached to the Application are true and
correct copies of what they purport to be.
3. Exhibits 1, 2, 3, 4, 5 and 6 attached hereto are true and correct
copies of what they purport to be.

4. I am admitted to practice before this Court and I am the attorney Prospective Petitioners/Applicants wish to retain to prepare their Petition for Writ of Certiorari to the Supreme Court of Washington.

5. I did not become aware that the Supreme Court of Washington had denied Prospective Petitioners/Applicants Petition for Review on May 4, 2022 until July 24, 2022, less than 10 days before the Petition for Writ of Certiorari would be due to be filed unless the Application for Extension of Time which this Declaration supports is granted.

6. I believe in good faith that the circumstances documented in the Declaration of Shelley Ann Erickson and Exhibits 1-6 attached thereto are extraordinary and have led to the need for this Application being filed under Rule 13.5.

7. The violations of Applicants' Due Process Rights raise important constitutional issues which affect the rights of litigants in the State of Washington.

8. Applicants are not indigent and are required to submit their Petition for Writ of Certiorari (the "Petition") in booklet format under Rule 33.1 of the Rules of the Supreme Court, which can require considerable time and effort in formatting, printing, and binding of the Petition.

9. Based on the experience of the undersigned, the process of formatting, printing and binding of a Petition prepared as required under

Rule 33.1 takes about two (2) weeks, depending on the number of documents to be included as Appendices which are necessary to an understanding of issues to be set forth in the Petition.

10. I have been involved in the matter which gives rise to the Petition as a legal assistant to the Applicants' trial attorney in the State of Washington, as an investigator to other attorneys in a related case, and have provided technological assistance and document management services to the Applicants in the underlying proceedings before the Washington Court of Appeals and the Supreme Court of Washington.

11. I am familiar with the scope and extent of the issues to be addressed in the Petition and they are important not only to the Applicants but also to litigants in the courts of the State of Washington and throughout the nation.

12. In order to do justice to the issues to be addressed in the Petition, after having had no notice of the May 4, 2022 Order of the Supreme Court of Washington until July 24, 2022, as well as the technicalities of proper preparation of the Petition in booklet format, an extension of time to file the Petition for Writ of Certiorari from August 2, 2022 to no later than October 1, 2022 is necessary.

13. I believe in good faith that the granting of the Application for an extension of 68 days from the date upon which Applicants became aware of the entry of the May 4, 2022 Order of the Washington Supreme

Court to the latest allowed date for extension of time to file petitions for writs of certiorari under Rule 13.3 will not harm the opposing party but denial of this Application would deprive Applicants of the opportunity to file their Petition for Writ of Certiorari because there is insufficient time for the Petition to be prepared and submitted for review.

FURTHER, YOUR APPLICANT SAYETH NAUGHT.

Dated at Madison, Wisconsin this 29th day of July, 2022.

/s/ Wendy Alison Nora

Wendy Alison Nora*
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*Admitted to practice before the United States Supreme Court only
and not admitted to practice in any other jurisdiction
**Providing research, investigative, technical, filing and
process services at the direction of qualified attorneys
in all U.S. states exclusive of the State of Wisconsin