1	Kirk D. Miller, WSBA #40025	
2	Attorneys for Intervenor Center for Justic KIRK D. MILLER, P.S.	ce .
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6		
7	U.S. DISTRICT COURT EASTERN DISTRICT OF WASHINGTON	
8	EASTERN DISTRIC	I OF WASHINGTON
9	ELF-MAN, LLC,	NO: 2:13-cv-00395-TOR
	Plaintiff,	REPLY IN SUPPORT OF CENTER
10	vs.	FOR JUSTICE'S MOTIONS TO INTERVENE AND UNSEAL
11	DVANI AMDEDCON on individual	RECORDS
12	RYAN LAMBERSON, an individual,	Note on Motion Calendar: 11/30/17
10	Defendant.	
13		
14	I. REPLY	
15	The Center for Justice ("CFJ") resp	pectfully requests that the Court grant its
16	Motions to Intervene (Dkt. No. 114) and	to Unseal Records (Dkt. No. 116).
17	Plaintiff Elf-Man, LLC has not file	ed a response to the substance of CFJ's
18	motions. Instead, David Lowe, Elf-Man'	s former attorney who reports having had
19	no communication with Elf-Man since 20	015, has asked for more time to respond
20	(purportedly on Elf-Man's behalf). See D	Okt. No. 121. In addition, non-party
21	CENTER FOR JUSTICE'S REPLY IN S MOTIONS TO INTERVENE AND UNS CASE NO: 2:13-cv-00395-TOR	

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Maureen VanderMay—Elf-Man's former attorney who withdrew several years ago based on a conflict—has also asked the Court for additional time to respond. See Dkt. No. 122. Although CFJ does not believe Elf-Man should require additional time to respond to motions that were filed three weeks ago, and CFJ is not familiar with any legal theory that provides Ms. VanderMay the standing to respond to CFJ's motions, CFJ will consider the substance of these motions and file a timely response on or before November 29. II. CONCLUSION Based on the foregoing, and the reasons set forth in CFJ's opening briefs, CFJ respectfully requests that this Court grant its motions without delay. RESPECTFULLY SUBMITTED AND DATED this 21st day of November, 2017. KIRK D. MILLER, P.S. By: /s/ Kirk D. Miller, WSBA #40025 Kirk D. Miller, WSBA #40025 Attorneys for Intervenor Center for Justice 421 W. Riverside Avenue, Suite 660 Spokane, Washington 99201-0410 Telephone: (509) 413-1494 Facsimile: (509) 413-1724 Email: kmiller@millerlawspokane.com CENTER FOR JUSTICE'S REPLY IN SUPPORT OF MOTIONS TO INTERVENE AND UNSEAL RECORDS CASE NO: 2:13-cv-00395-TOR

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1	<u>CERTIFICATE OF SERVICE</u>
2	I, Kirk D. Miller, hereby certify that on November 20, 2017, I
3	electronically filed the foregoing with the Clerk of the Court using the CM/ECF
4	system which will send notification of such filing to the following:
5	David Allen Lowe, WSBA #24453 Attorneys for Elf-Man LLC
6	LOWE GRAHAM JONES PLLC 701 Fifth Avenue, Suite 4800
7	Seattle, Washington 98104 Telephone: (206) 381-3300
8	Email: lowe@lowegrahamjones.com
9	John Christopher Lynch, WSBA #17462 Jeffrey Ray Smith, WSBA #37460
10	Rhett V. Barney, WSBA #44764 Attorneys for Ryan Lamberson
11	LEE & HAYES, PLLC 601 West Riverside Avenue, Suite 1400
12	Spokane, Washington 99201 Telephone: (509) 324-9256
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15	Collette C. Leland, WSBA #40686
16	Attorneys for Interested Party Maureen VanderMay WINSTON & CASHATT
17	601 West Riverside Avenue, Suite 1900
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20	
21	CENTER FOR JUSTICE'S REPLY IN SUPPORT OF MOTIONS TO INTERVENE AND UNSEAL RECORDS CASE NO: 2:13-cv-00395-TOR

1	DATED this 21st day of November, 2017.	
2	KIRK D. MILLER, P.S.	
3	D . / / W' 1 D M'11 WGD A #40025	
4	By: <u>/s/ Kirk D. Miller, WSBA #40025</u> Kirk D. Miller, WSBA #40025 Attorneys for Intervenor Center for Justice	
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