

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

CARL OLSEN,)	
)	
Petitioner,)	CASE NO. CV 8682
)	
vs.)	MOTION FOR LEAVE
)	TO FILE SUPPLEMENTAL
STATE OF IOWA,)	MEMORANDUM
)	IN OPPOSITION TO
Respondent.)	MOTION TO DISMISS

Pursuant to Iowa R. Civil P. 1.441(4), Carl Olsen (“Olsen” hereafter) respectfully moves for leave to file the attached Supplemental Memorandum in Opposition to the State of Iowa’s (“Respondent” hereafter) Motion to Dismiss. The ground for this motion is that the Respondent brought a new issue to this court’s attention for the first time at the hearing on the Respondent’s Motion to Dismiss held in courtroom 307 of the Polk County Courthouse on Friday, September 23, 2011, at 9:00 a.m., and Olsen did not have the opportunity to address that issue in his Resistance to the Respondent’s Motion to Dismiss filed on August 9, 2011.

Respectfully submitted,

CARL OLSEN

CARL OLSEN
130 E. Aurora Ave.
Des Moines, IA 50313-3654
515-288-5798 home phone
515-343-9933 cell phone
carl-olsen@mchsi.com

Copy to:

Scott Galenbeck
Iowa Assistant Attorney General
1305 E. Walnut Street
Des Moines IA 50319

George McMahon
902 4th Street
Livermore, IA 50558

Ladd Huffman
210 S. 2nd Street
Calumet, IA 51009

Robert Manke
1603 10th Street
Nevada, IA 50201

Alan Koslow
2716 Jordan Grove
West Des Moines, IA 50265-6462

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was served upon each of the parties in the above entitled cause by enclosing the same in an envelope addressed to each such party at their respective address as disclosed by the pleadings of record herein, with postage fully paid, and by depositing said envelopes in a United

States Post Office depository in Des Moines, Iowa on the 26th day of September, 2011.

CARL OLSEN