

**Holly v. Arrieta, No. 67591, Order of Reversal and Remand (Unpublished
Disposition Apr. 15, 2016)
SC UNPUB**

The addition of three days at the end of the count for when an action is due to be accomplished, applies to any time limit established by statute. In this case, the request for trial de novo was required within 30 days of the arbitration decision.