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2 **CITY OF SPOKANE ETHICS COMMISSION**

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4 Jamie Pendleton

5 Plaintiff,

6 vs.

7 David Condon, Mayor Of City Of Spokane,

8 Defendant

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)  
) MOTION TO DENY EXTENSION OF TIME TO  
) RESPOND TO ETHIC COMMISSION COMPLAINTS  
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10 **I. PARTIES FILING THE MOTION**

11 This motion is filed by the Complainant

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13 **II. RELIEF REQUESTED**

14 Complainant moves this commission to deny the extension of time to file  
15 responses to individual Ethic Commission Complaints filed by Jamie Pendleton,  
16 on November 30<sup>th</sup> 2015. The deadline of January 13<sup>th</sup> prior to the scheduled  
17 January 27<sup>th</sup> hearing already determined by the commission on December 9<sup>th</sup> should  
18 remain intact.

19 **III. FACTS RELEVANT TO THE MOTION**

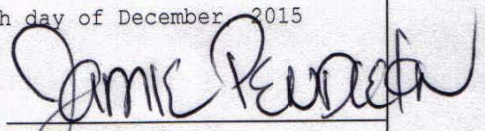
20 This motion is based upon the supporting Declaration of Jamie Pendleton

21 **IV. BASIS FOR RELIEF REQUESTED**

22 The undersigned submits that for the reasons set forth in the  
23 Declaration of Jamie Pendleton the ends of justice would be served by not  
24 permitting the requested extension of time from the current set date of January  
25 13<sup>th</sup> 2013.

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Dated this 20th day of December, 2015

  
\_\_\_\_\_  
Jamie Pendleton

MOTION DENYING EXTENSION TO RESPOND PAGE 2

CERTIFICATE OF SERVICE

EVANS, CRAVEN, & LACKIE  
James King  
818 W Riverside Suite 250  
Spokane, Wa 99201-0910

VIA EMAIL { ☒ }  
VIA REGULAR MAIL { ☒ }

MOTION DENYING EXTENSION TO RESPOND PAGE 3



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2 **CITY OF SPOKANE ETHICS COMMISSION**  
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4 Jamie Pendleton

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6 vs.

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8 Defendant

)  
) DECLARATION OF JAMIE PENDLETON  
) IN SUPPORT OF COMPLAINANT'S MOTION  
) TO DENY THE EXTENSION OF TIME TO  
) RESPOND TO ETHIC COMMISSION  
) COMPLAINTS  
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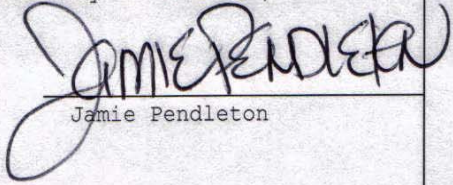
9  
10 Jamie Pendleton under the penalty of perjury under the laws of the State Of  
11 Washington states and declares as follows:

- 12 1. I am one of the complainants in this case. I have personal knowledge of the  
13 facts contained in this declaration and am competent to testify to them
- 14 2. Respondent's response on the substantive merits of the individual Ethics  
15 Commission Complaints are **not** due on December 29<sup>th</sup>. The Ethics commission is  
16 only requesting a written response that "shall" only pertain to whether the  
17 complaints should be dismissed pursuant to SMC 1.04a.110 D. 1 a-f. and shall  
18 not address the merits of the complaint. (*see Rule 4.3(1) Adjudications Process*  
19 *inside City Of Spokane Ethics Commission Policy and Procedures Manual*)
- 20 3. The Respondents responses to dismissal of the complaint are optional, and do  
21 not require a mandatory response by December 29<sup>th</sup>. The response on the actual  
22 merits of filed complaints is due 10 business days before the hearing date  
23 which is set for January 27<sup>th</sup>.
- 24 4. Respondents will suffer no prejudice by not filing an optional request for  
25 dismissal on December 29<sup>th</sup> when due.
- 26 5. The respondents motion for extension of time to respond on the merits alone  
27 therefore is superfluous  
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DECLARATION OF JAMIE PENDLETON PAGE 1

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Dated this 20th day of December, 2015

  
\_\_\_\_\_  
Jamie Pendleton



DECLARATION OF JAMIE PENDLETON PAGE 2

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James King  
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)  
) ORDER DENYING MOTION FOR EXTENSION OF TIME  
) TO RESPOND TO ETHIC COMMISSION COMPLAINTS  
) AND SETTING DEADLINE TO SUBMIT RESPONSE  
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10 THIS MATTER came on before the above-entitled Ethics Commission on the day and  
11 date written on the motion of the respondent for an order Granting Extension to Submit  
12 Responses to Ethics Commission Complaints.

13 The Commission having considered the records and files herein, including the  
14 Respondent's Motion and the Declaration of Jamie Pendleton, and being fully advised in  
15 the premises, it is hereby

16 ORDERED, ADJUDGED, AND DECREED that the Complainant's Motion for an Order  
17 Denying extension to Response to Ethics Commission complaints and that the response on  
18 the merits remain due on January 13<sup>th</sup> 2016.

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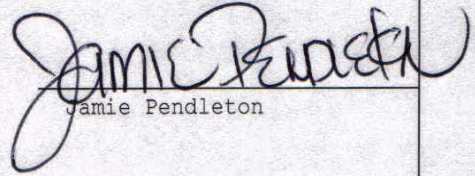
26 PROPOSED ORDER DENYING EXTENSION TO RESPOND PAGE 1

27

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Dated this 20th day of December, 2015

  
Jamie Pendleton

PROPOSED ORDER DENYING EXTENSION TO RESPOND PAGE 2



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PROPOSED ORDER DENYING EXTENSION TO RESPOND PAGE 3