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DEC 17 2015

OFFICE OF THE CITY ATTORNEY

CITY OF SPOKANE ETHICS COMMISSION

IN RE: ETHICS COMMISSION
COMPLAINTS AGAINST

DAVID CONDON, MAYOR OF THE
CITY OF SPOKANE,

Respondent.

MOTION FOR EXTENSION OF TIME
TO RESPOND TO ETHIC
COMMISSION COMPLAINTS

(WITHOUT ORAL ARGUMENT)

I. PARTIES FILING THE MOTION

This motion is filed by the Respondent, through his respective counsel.

II. RELIEF REQUESTED

Respondent moves this Commission for an extension of time to file his Responses to individual Ethics Commission Complaints filed by Mara Spitzer, Alexander Shogan, Jr., Jamie Pendleton and Teresa Juneau-Simon, extending the deadline from December 29, 2015, to a date after the Commission's decision deciding jurisdiction on January 13, 2016 and before the Commission's meeting on January 27, 2016, said response date to be determined by this Commission.

III. FACTS RELEVANT TO THE MOTION

This motion is based upon the supporting Declaration of James B. King.

IV. BASIS FOR RELIEF REQUESTED

The undersigned submits that for the reasons set forth in the Declaration of James B. King the ends of justice would be served by permitting Respondent the requested extension of time from the

MOTION FOR EXTENSION- page 1

Evans, Craven & Lackie, P.S.
818 W. Riverside, Suite 250
Spokane, WA 99201-0910
(509) 455-5200; fax (509) 455-3632

1 current due date of December 29, 2015 to a date after the Commission's decision regarding jurisdiction
2 which is set for January 13, 2016, to file his responses.

3 DATED at Spokane, Washington this 16 day of December, 2015.

4 EVANS, CRAVEN & LACKIE, P.S.

5 By

6 James B. King, WSBA #8723
7 Attorney for Respondent
8 David Condon
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CERTIFICATE OF SERVICE

Pursuant to RCW 9A.72.085, the undersigned hereby certifies under penalty of perjury under the laws of the State of Washington, that on the 17 day of December, 2015, the foregoing was delivered to the following persons in the manner indicated:

Mara Spitzer
1010 S. Rockwood Blvd., #316
Spokane, WA 99202

VIA REGULAR MAIL ☒
VIA CERTIFIED MAIL ☐
VIA FACSIMILE ☐
HAND DELIVERED ☐

Jamie Pendleton
P.O. Box 1888
Veradale, WA 99037

VIA REGULAR MAIL ☒
VIA CERTIFIED MAIL ☐
VIA FACSIMILE ☐
HAND DELIVERED ☐

Alexander J. Shogan, Jr.
5726 N. Sutherlin Street
Spokane, WA 99205

VIA REGULAR MAIL ☒
VIA CERTIFIED MAIL ☐
VIA FACSIMILE ☐
HAND DELIVERED ☐

Teresa Juneau-Simon
708 S. Thor Street
Spokane, WA 99202

VIA REGULAR MAIL ☒
VIA CERTIFIED MAIL ☐
VIA FACSIMILE ☐
HAND DELIVERED ☐

12-17-15 / Spokane, WA
(Date/Place)



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CITY OF SPOKANE ETHICS COMMISSION

**IN RE: ETHICS COMMISSION
COMPLAINTS AGAINST**

**DAVID CONDON, MAYOR OF THE
CITY OF SPOKANE,**

Respondent.

DECLARATION OF JAMES B. KING
IN SUPPORT OF RESPONDENT'S
MOTION FOR EXTENSION OF TIME
TO RESPOND TO ETHIC
COMMISSION COMPLAINTS

James B. King, under the penalty of perjury under the laws of the State of Washington,
states and declares as follows:

1. I am the attorney for the respondent herein and make this Declaration based
upon personal knowledge and in support of Respondent's Motion for Extension of Time to
Respond to Ethic Commission Complaints from December 29, 2015 to a date after January 13,
2016, to be determined by the Ethics Commission but before the Commission hearing set for
January 27, 2016.

2. Respondent's responses on the substantive merits of the individual Ethics
Commission Complaints are due prior to the Ethics Commission decision on the jurisdictional
aspects presently set for January 13, 2016, which is manifestly inappropriate and an extension
is therefore warranted.

3. Claimants will suffer no prejudice by granting respondent's request for extension to respond.

DATED at Spokane, Washington this 17 day of December, 2015.

By James B. King, WSBA #8723
Attorney for Respondent
David Condon

CERTIFICATE OF SERVICE

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CITY OF SPOKANE ETHICS COMMISSION

IN RE: ETHICS COMMISSION
COMPLAINTS AGAINST

DAVID CONDON, MAYOR OF THE
CITY OF SPOKANE,

Respondent.

ORDER GRANTING MOTION FOR
EXTENSION OF TIME TO RESPOND
TO ETHIC COMMISSION
COMPLAINTS AND SETTING
DEADLINE TO SUBMIT RESPONSE

THIS MATTER came on before the above-entitled Ethics Commission on the day and date written below on the motion of the respondent for an Order Granting Extension to Submit Responses to Ethics Commission Complaints.

The Commission having considered the records and files herein, including the Respondent's Motion and the Declaration of James B. King, and being fully advised in the premises, it is hereby

ORDERED, ADJUDGED AND DECREED that Respondent's Motion for an Order Granting Extension to Response to Ethics Commission Complaints until after the January 13, 2016, meeting to address adjudication matters is hereby GRANTED. The response(s) to the Ethics Commission Complaints are now due on _____.

PROPOSED ORDER GRANTING EXTENSION TO
RESPOND - page 1

Evans, Craven & Lackie, P.S.
818 W. Riverside, Suite 250
Spokane, WA 99201-0910
(509) 455-5200; fax (509) 455-3632

1 DONE this ____ day of _____, 2015.

2
3 Troy Bruner, Chair
Ethics Commission

4 Presented by:

5 EVANS, CRAVEN & LACKIE, P.S.

6 By:

7 James B. King, WSBA #8723
8 Attorneys for Respondent

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29 PROPOSED ORDER GRANTING EXTENSION TO
30 RESPOND - page 2

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PROPOSED ORDER GRANTING EXTENSION TO
RESPOND - page 3

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