1 2 3 4 5	RECEIVED DEC 17 2015 OFFICE OF THE CITY ATTORNEY		
6	CITY OF SPOKANE ETHICS COMMISSION		
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8 9 10	IN RE: ETHICS COMMISSION COMPLAINTS AGAINST DAVID CONDON, MAYOR OF THE CITY OF SPOKANE,	MOTION FOR EXTENSION OF TIME TO RESPOND TO ETHIC COMMISSION COMPLAINTS	
11		(WITHOUT ORAL ARGUMENT)	
12	Respondent.		
13	DADTIES EN INC THE MOTION		
14 15	I. PARTIES FILING THE MOTION		
16	This motion is filed by the Respondent, through his respective counsel.		
17	II. RELIEF REQUESTED		
18	Respondent moves this Commission for an extension of time to file his Responses to individual		
19	Ethics Commission Complaints filed by Mara Spitzer	, Alexander Shogan, Jr., Jamie Pendleton and Teresa	
20	Juneau-Simon, extending the deadline from December 29, 2015, to a date after the Commission's decision		
21	deciding jurisdiction on January 13, 2016 and before the Commission's meeting on January 27, 2016,		
22	said response date to be determined by this Commission.		
23	III. FACTS RELEVANT TO THE MOTION		
24	This motion is based upon the supporting Declaration of James B. King.		
25 26	IV. BASIS FOR RELIEF REQUESTED		
20	The undersigned submits that for the reasons set forth in the Declaration of James B. King the		
28			
29	MOTION FOR EXTENSION- page 1		
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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 Aay of December, 2015.
4	EVANS, CRAVEN & LACKIE, P.S.
5	By
6	James B, King, WSBA #8723
7	Attorney for Respondent David Condon
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29	MOTION FOR EXTENSION mage 2
30	MOTION FOR EXTENSION- page 2 Evans, Craven & Lackie, P.S. 818 W. Riverside, Suite 250 Spokane, WA 99201-0910 (509) 455-5200; fax (509) 455-3632

1 CERTIFICATE OF SERVICE 2 Pursuant to RCW 9A.72.085, the undersigned hereby certifies under penalty of permunder 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: 5 Mara Spitzer VIA REGULAR MAIL [6 1010 S. Rockwood Blvd., #316 VIA REGULAR MAIL [7 VIA REGULAR MAIL [8 Jamie Pendleton VIA REGULAR MAIL [9 P.O. Box 1888 VIA REGULAR MAIL [10 VIA REGULAR MAIL [10 VIA REGULAR MAIL [11 VIA REGULAR MAIL [12 Alexander J. Shogan, Jr. VIA REGULAR MAIL [13 Spokane, WA 99205 VIA REGULAR MAIL [13 Spokane, WA 99205 VIA REGULAR MAIL [14 Ceresa Juneau-Simon VIA REGULAR MAIL [16 Teresa Juneau-Simon VIA REGULAR MAIL [16 Teresa Juneau-Simon VIA REGULAR MAIL [16 <th></th>	
3Pursuant to RCW 9A.72.085, the undersigned hereby certifies under penalty of period3under the laws of the State of Washington, that on the 12 day of December, 2015, the4foregoing was delivered to the following persons in the manner indicated:5Mara SpitzerVIA REGULAR MAIL [61010 S. Rockwood Blvd., #316VIA CERTIFIED MAIL [7VIA Spokane, WA 99202VIA FACSIMILE [8HAND DELIVERED [8Jamie PendletonVIA REGULAR MAIL [9P.O. Box 1888VIA CERTIFIED MAIL [10Veradale, WA 99037VIA REGULAR MAIL [11Veradale, WA 99037VIA REGULAR MAIL [12Alexander J. Shogan, Jr.VIA REGULAR MAIL [13Spokane, WA 99205VIA REGULAR MAIL [14Teresa Juneau-SimonVIA REGULAR MAIL [15Teresa Juneau-SimonVIA REGULAR MAIL [16708 S. Thor StreetVIA REGULAR MAIL [16Spokane, WA 99202VIA FACSIMILE [
 ³ under the laws of the State of Washington, that on the <u>12</u> day of December, 2015, the foregoing was delivered to the following persons in the manner indicated: ⁵ Mara Spitzer VIA REGULAR MAIL [1010 S. Rockwood Blvd., #316 VIA CERTIFIED MAIL [1010 S. Rockwood Blvd., #316 VIA CERTIFIED MAIL [1010 S. Rockwood Blvd., #316 VIA CERTIFIED MAIL [111 VIA FACSIMILE [12 Alexander J. Shogan, Jr. Spokane, WA 99205 VIA REGULAR MAIL [13 Spokane, WA 99205 VIA REGULAR MAIL [14 VIA REGULAR MAIL [15 Teresa Juneau-Simon VIA REGULAR MAIL [16 Spokane, WA 99202 VIA FACSIMILE [17 VIA REGULAR MAIL [18 Spokane, WA 99202 VIA REGULAR MAIL [19 VIA FACSIMILE [19 VIA REGULAR MAIL [10 VIA REGULAR MAIL [11 VIA CERTIFIED MAIL [12 Alexander J. Shogan, Jr. VIA REGULAR MAIL [13 Spokane, WA 99205 VIA CERTIFIED MAIL [14 VIA FACSIMILE [15 Teresa Juneau-Simon VIA REGULAR MAIL [16 Spokane, WA 99202 VIA FACSIMILE [17 VIA FACSIMILE [18 VIA CERTIFIED MAIL [19 VIA REGULAR MAIL [10 VIA FACSIMILE [11 VIA FACSIMILE [12 Alexander J. Shogan, Jr. Spokane, WA 99205 VIA CERTIFIED MAIL [13 Spokane, WA 99205 VIA CERTIFIED MAIL [14 VIA FACSIMILE [15 Teresa Juneau-Simon VIA REGULAR MAIL [16 Spokane, WA 99202 VIA FACSIMILE [17 VIA FACSIMILE [18 VIA CERTIFIED MAIL [19 VIA FACSIMILE [19 VIA FACSIMILE [10 VIA FACSIMILE [10 VIA FACSIMILE [10 VIA FACSIMILE [11 VIA FACSIMILE [12 NIA FACSIMILE [13 NIA [14 VIA [15 NIA [15 NIA [15 NIA [16 NIA [16 NIA [16 NIA [17 NIA [
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30 MOTION FOR EXTENSION- page 3 Evans, Craven & Lackie 818 W. Riverside, Spokane, WA 99 (509) 455-5200; fax (509)	Suite 250 201-0910

	RECEIVED		
1	DEC 17 2015		
2	OFFICE OF THE CITY ATTORNEY		
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6	CITY OF SPOKANE ETHICS COMMISSION		
7 8	IN RE: ETHICS COMMISSION COMPLAINTS AGAINST	DECLARATION OF JAMES B. KING	
9		IN SUPPORT OF RESPONDENT'S MOTION FOR EXTENSION OF TIME	
10	DAVID CONDON, MAYOR OF THE CITY OF SPOKANE,	TO RESPOND TO ETHIC	
11	Respondent	COMMISSION COMPLAINTS	
12	Respondent.		
13 14	James B. King, under the penalty of perjury under the laws of the State of Washington,		
14	states and declares as follows:		
16			
17	1. I am the attorney for the respond	ent herein and make this Declaration based	
18	upon personal knowledge and in support of Respondent's Motion for Extension of Time to		
19	Respond to Ethic Commission Complaints from	n December 29, 2015 to a date after January 13,	
20	2016, to be determined by the Ethics Commission but before the Commission hearing set for		
21 22	January 27, 2016.		
23	2. Respondent's responses on the substantive merits of the individual Ethics		
24	Commission Complaints are due prior to the Ethics Commission decision on the jurisdictional		
25	aspects presently set for January 13, 2016, which is manifestly inappropriate and an extension		
26			
27	is therefore warranted.		
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29	DECLARATION OF JAMES B. KING - Page 1		
30	DECLARATION OF JAMES B. KING - Page 1 Evans, Craven & Lackie, P.C 818 W. Riverside, Suite 2 Spokane, WA 99201-09 (509) 455-5200; fax (509) 455-36		

1	3. Claimants will suffer no prejudice by granting respondent's request for	
2	extension to respond.	
3	DATED at Spokane, Washington this day of December, 2015	
4	DATED at Spokane, washington uns + (day of December, 2012)	
5	Ву	
6	James B. King, WSBA #8723 Attorney for Respondent David Condon	
7	David Condon	
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29 20	DECLARATION OF JAMES B. KING - Page 2	
30	Evans, Craven & Lackie, P.S. 818 W. Riverside, Suite 250 Spokane, WA 99201-0910 (509) 455-5200; fax (509) 455-3632	

1	CERTIFICATE OF SERVICE		
2	Demonstry a DCW 04.72.085 the undersigned breaky cortified under penalty of perjury		
3	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 <u>11</u> day of December, 2015, the		
4	foregoing was delivered to the following persons in the manner indicated:		
5	Mara Spitzer VIA REGULAR MAIL		
6	1010 S. Rockwood Blvd., #316VIA CERTIFIED MAILSpokane, WA99202VIA FACSIMILE []		
7	HAND DELIVERED N		
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9	Jamie Pendleton VIA REGULAR MAIL		
10	Veradale, WA 99037 VIA FACSIMILE []		
11	HAND DELIVERED []		
12	Alexander J. Shogan, Jr. VIA REGULAR MAIL		
13	5726 N. Sutherlin StreetVIA CERTIFIED MAILSpokane, WA 99205VIA FACSIMILE []		
14	HAND DELIVERED []		
15	Teresa Juneau-Simon VIA REGULAR MAIL		
16	708 S. Thor Street VIA CERTIFIED MAIL		
17	Spokane, WA 99202 VIA FACSIMILE [] HAND DELIVERED []		
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30	DECLARATION OF JAMES B. KING - Page 3 Evans, Craven & Lackie, P.S. 818 W. Riverside, Suite 250 Spokane, WA 99201-0910 (509) 455-5200; fax (509) 455-3632		

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1		DEC 17 2015	
2		OFFICE OF THE CITY ATTORNEY	
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6	CITY OF SPOKANE ETHICS COMMISSION		
7 8 9	IN RE: ETHICS COMMISSION COMPLAINTS AGAINST	ORDER GRANTING MOTION FOR EXTENSION OF TIME TO RESPOND	
10	DAVID CONDON, MAYOR OF THE CITY OF SPOKANE,	TO ETHIC COMMISSION COMPLAINTS AND SETTING	
11		DEADLINE TO SUBMIT RESPONSE	
12	Respondent.		
13			
14			
15	THIS MATTER came on before the abo	ve-entitled Ethics Commission on the day and	
16 17	date written below on the motion of the respond	lent for an Order Granting Extension to Submit	
18	Responses to Ethics Commission Complaints.		
19	The Commission having considered the records and files herein, including the		
20 21	Respondent's Motion and the Declaration of James B. King, and being fully advised in the		
22	premises, it is hereby		
23	ORDERED, ADJUDGED AND DECREED that Respondent's Motion for an Order		
24	Granting Extension to Response to Ethics Commission Complaints until after the January 13,		
25			
26			
27	Ethics Commission Complaints are now due of	1•	
28			
29	PROPOSED ORDER GRANTING EXTENSION RESPOND - page 1	TO Evans, Craven & Lackie, P.S. 818 W. Riverside, Suite 250	
30		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	
5	Presented by:
6	EVANS, CRAVEN & LACKIE, P.S.
7	By:
8	James B. King, WSBA #8723 Attorneys for Respondent
9	Canonicy's for respondent
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28 29	PROPOSED ORDER GRANTING EXTENSION TO Evans, Craven & Lackie, P.S.
29 30	RESPOND - nage 2 818 W. Riverside, Suite 250
50	Spokane, WA 99201-0910 (509) 455-5200; fax (509) 455-3632

1	CERTIFICATE OF SERVICE		
2	Pursuant to RCW 9A 72 085 the undersigned hereby certi	fies under penalty of perjury	
3	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 n_1 day of December, 2015, the foregoing was delivered to the following persons in the manner indicated:		
5		IA REGULAR MAIL	
		A CERTIFIED MAIL []	
6 7	Spokane, WA 99202	VIA FACSIMILE [] HAND DELIVERED []	
8	Lewis Deadleter	IA REGULAR MAIL	
9	P.O. Box 1888 V	IA CERTIFIED MAIL []	
10	Veradale, WA 99037	VIA FACSIMILE [] HAND DELIVERED []	
11			
12	Therander 5: Shogan, 51	/IA REGULAR MAIL 🎦 IA CERTIFIED MAIL []	
13	5726 N. Sutherlin Street V Spokane, WA 99205	VIA FACSIMILE []	
14		HAND DELIVERED []	
15	Teresa Juneau-Simon	VIA REGULAR MAIL	
16	708 S. Thor Street V	IA CERTIFIED MAIL []	
17	Spokane, WA 99202	VIA FACSIMILE [] HAND DELIVERED []	
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28 29	PROPOSED ORDER GRANTING EXTENSION TO	Evans, Craven & Lackie, P.S.	
29 30	RESPOND - page 3	818 W. Riverside, Suite 250	
50		Spokane, WA 99201-0910 (509) 455-5200; fax (509) 455-3632	