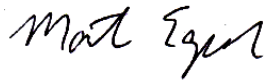


DISTRICT COURT, DENVER COUNTY, COLORADO		DATE FILED: April 23, 2020 1:35 PM CASE NUMBER: 2020CV30870
Court Address: 1437 BANNOCK STREET, RM 256, DENVER, CO, 80202		
Plaintiff(s) GUILIANA DAY v. Defendant(s) JENA GRISWOLD AS SECRETARY OF ST OF COLO		<p style="text-align: center;">△ COURT USE ONLY △</p> Case Number: 2020CV30870 Division: 424 Courtroom:
Order:Unopposed Motion to Extend Circulation Deadline		

The motion/proposed order attached hereto: GRANTED.

Issue Date: 4/23/2020



MARTIN FOSTER EGELHOFF
District Court Judge

DISTRICT COURT, DENVER COUNTY, STATE OF COLORADO 1427 Bannock Street Denver, Colorado 80202	
Petitioner: GUILIANA DAY v. Respondent: JENA GRISWOLD, as Secretary of State for the State of Colorado	▲ COURT USE ONLY ▲
Attorney for Petitioner: Suzanne Staiert, No. 23411 Maven Law Group 1800 Glenarm Place, Suite 950 Denver, CO 80202 Phone Number: (303) 263-0844 E-mail: sstaiert@mavenlawgroup.com	Case No.: 20CV30870 Courtroom: 424
UNOPPOSED MOTION TO EXTEND CIRCULATION DEADLINE	

Petitioner, by and through its attorney, files this Emergency Motion to Extend Circulation Deadline. As grounds for this Motion Petitioner states:

Pursuant to C.R.C.P. 121 1-15(8) Petitioner’s counsel conferred with Respondent’s counsel regarding the relief sought in this Motion. Respondent’s counsel does not oppose this motion.

1. On March 4, 2020, Petitioner submitted Initiative 2019-2020 #120, Prohibition on Late-Term Abortions, to the Secretary of State for review.
2. The Secretary of State had 30 days to review the petition for sufficiency, or until April 3, 2020. CRS § 1-40-117(2).
3. On March 25, 2020, Governor Jared Polis signed Executive Order #D2020-17 effective through April 11, 2020. The Order directs, “[a]ll Coloradans to stay at home, subject to limited exceptions such as obtaining food and other household necessities, going to and from work at critical businesses, seeking medical care, caring for dependents or pets, or caring for a vulnerable person in another location.”
4. On April 3, 2020, the Secretary of State notified Petitioner that the petition was insufficient because 114,647 signatures out of the 137,624 submitted had been counted as

valid. While under CRS § 1-40-117, Petitioner has the right to a cure period to obtain the additional required signatures to meet the 124,632 required for ballot placement, this Court granted Petitioner's order to extend the circulation cure period to begin only after the expiration of a stay at home order.

5. On April 20, 2020, Governor Jared Polis held a press conference, explaining that he would partially open the state on April 27, 2020. However, he repeatedly urged Coloradans to continue to stay at home as much as possible. He explained that the opening on April 27, 2020, is the beginning of an economic opening, but not a social opening – which is the type of opening required to conduct signature gathering activities.
6. As evidence that a stay-at-home order is still practically in effect and that election processes continue to be suspended or altered through mid-May, Executive Orders #D2020-008 and #D2020-36 allow the Secretary of State's office to operate through electronic means, avoiding in-person contact until May 15, 2020. The Colorado legislature will not return to session until May 18, 2020.

Wherefore, Petitioner respectfully requests this court extend the circulation cure period to begin on May 15, 2020.

Respectfully submitted this 22nd day of April 2020.

MAVEN LAW GROUP

/s/ Suzanne Staiert

Suzanne Staiert

Attorney for the Petitioner

CERTIFICATE OF SERVICE/MAILING

I hereby certify that on 22nd day of April, 2020 a true and correct copy of the **UNOPPOSED MOTION TO EXTEND CIRCULATION DEADLINE** was served via the State of Colorado's ICCES File and Serve e-filing system, email and United States mail, postage prepaid, properly addressed to the following:

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Attorneys for Respondent

/s/ Suzanne Staiert _____

Suzanne Staiert

*Duly signed original on file at Maven Law
Group*