

STATE OF COLORADO
SECRETARY OF STATE
1700 BROADWAY #550
DENVER, COLORADO 80290

BEFORE THE SECRETARY OF STATE, COLORADO DEPARTMENT OF STATE,
ADMINISTRATIVE HEARING OFFICER

AHO Case No. 2025 AHO 15 (CPF)

ED Case No. 2025-01

In the Matter of

ELECTIONS DIVISION OF THE SECRETARY OF STATE,

Complainant,

vs.

DOUGLAS COUNTY VICTORY FUND,

Respondent.

JOINT MOTION FOR EXTENSION OF TIME

The Elections Division and Douglas County Victory Fund respectfully request commensurate extensions on the deadlines for their respective Response and Reply to the Motion to Dismiss. As good cause, the parties state:

1. Respondent, Douglas County Victory Fund, moved to dismiss this action on June 12, 2025. Under the Secretary's Rules, the Division's Response to the Motion to Dismiss is due on June 26, 2025. 8 CCR 1505-3, Rule 3.6.3(d).
2. To fully and adequately respond to the arguments in Respondent's Motion, counsel for the Division requires a brief extension. The cause for the extension includes the planned absence of one of the Division's client representatives and an unexpected illness in counsel's family.
3. Accordingly, the Division respectfully requests a seven-day extension of time to respond to the Motion, up to and including July 3, 2025.
4. Under the Secretary's rules, that extension would leave Respondent's Reply due on July 10, 2024.

5. Because of the intervening holiday, Respondent respectfully requests a commensurate seven-day extension of time to file its Reply, up to and including July 17, 2025.

6. Neither party opposes the other's requested extension.

7. The public will not be harmed by the requested extensions. Because the parties' dispute in this matter is primarily legal, rather than factual, the public—and the Hearing Officer—will benefit from robust briefing on the legal questions raised by the Motion to Dismiss.

Accordingly, the parties respectfully request an Order extending the Division's time to file its Response to the Motion to Dismiss by seven days, up to and including July 3, 2025, and extending Respondent's time to file its Reply in Support of its Motion to Dismiss by seven days, up to and including July 17, 2025.

Respectfully submitted this 18th day of June, 2025.

PHILIP J. WEISER
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CERTIFICATE OF SERVICE

This is to certify that I will cause the foregoing to be served this 18th day of June, 2025, by email and/or U.S. mail, addressed as follows:

Douglas County Victory Fund
C/O Counsel Christopher Murray
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Respondent

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/s/ Peter G. Baumann