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STATE OF COLORADO  
SECRETARY OF STATE  
Administrative Hearing Office  
1700 Broadway, Suite 550  
Denver CO. 80290

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Case Number: 2025 AHO 17 CPF  
(*in re* ED 2024-64)

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IN THE MATTER OF:

ELECTIONS DIVISION of the SECRETARY OF STATE

Complainant

v.

KEN DEGRAAF FOR HD-22

Respondent

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**RESPONDENT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE  
RESPONSIVE PLEADING**

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Respondent, Ken DeGraaf for HD-22, by and through his undersigned counsel John S. Zakhem, and the law office of Campbell Killin Brittan and Ray, LLC, hereby submit this Unopposed Motion for Extension of Time to File Responsive Pleading, and in support thereof, state as follows:

**CERTIFICATE OF CONFERRAL**

Counsel for Respondent hereby certifies that he has conferred with Complainant's counsel regarding this Motion and was advised that they do not oppose the Motion, or the relief requested herein.

**MOTION**

1. Complainant's filed their initial Complaint on May 2, 2025.
2. Pursuant to the Scheduling Order executed on June 20, 2025, Respondent's deadline to file their Response to the Complaint is July 7, 2025.
3. Counsel for the Respondent was retained as representation on July 2, 2025.
4. In order to properly and effectively analyze the complaint and supporting documents, to sufficiently prepare a response, Respondent's require additional time.
5. Respondent, therefore, respectfully request an extension of 14 days from the current deadline to respond to the Complaint.
6. This extension requested is in good faith and is not made for the purpose of hindering or delaying the case at its earliest stages. Complainant's counsel have advised that they do not object to the requested extension. No party will be prejudiced by granting the relief sought in this Motion.

**WHEREFORE**, Respondent respectfully request that this Court grant them a 14-day extension of time, up to and including July 21, 2025, to file their Response to the Complaint.

Respectfully submitted on this 3rd day of July, 2025:

**Campbell Killin Brittan & Ray**

*s/ John S. Zakhem*

John S. Zakhem, #30089

Campbell Killin Brittan & Ray, LLC

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 3rd day of July 2025, I electronically filed the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING** with the Secretary State of Colorado and copying all parties of record.

*s/ Amanda Herrman*

Amanda Herrman, paralegal

4935-7361-3111, v. 1