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The Honorable John C. Coughenour

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

WASHINGTON STATE REPUBLICAN
PARTY, et al.,

Plaintiffs,

WASHINGTON DEMOCRATIC
CENTRAL COMMITTEE, PAUL
BERENDT,

Plaintiff Intervenors

LIBERTARIAN PARTY OF
WASHINGTON STATE, RUTH
BENNETT and J. S. MILLS,

Plaintiff Intervenors

v.

STATE OF WASHINGTON, et al.,

Defendants,

WASHINGTON STATE GRANGE, et
al.

Defendant Intervenors

Case No: CV05-0927-JCC

LIBERTARIAN PARTY'S
MOTION TO EXTEND TIME
TO REPLY TO OPPOSITION
TO MOTION TO FILE
FIRST AMENDED COMPLAINT
IN INTERVENTION FOR
DECLARATORY JUDGMENT AND
OTHER RELIEF

Noted for February 19, 2010

No oral argument requested

Pursuant to CR 15[a] and [d] the Libertarian Party of
Washington State requests leave of the court to extend the time to

1 reply to the opposition to its motion to file its First Amended Complaint
2 in intervention until February 24, 2010. The Libertarian Party moves
3 based on the following:

4 (1) Counsel for the Libertarian Party is a sole practitioner;

5 (2) The reply to the opposition to the motion to amend will
6 require substantial time;

7 (3) Counsel for the Libertarian Party has several other
8 matters, including three medical expert depositions, and a time-
9 sensitive bankruptcy court filing due during the same period;

10 (4) Counsel for the State of Washington and the
11 Washington Grange have agreed to the extension of time.

12
13
14 **CONCLUSION**

15 The Libertarian Party should be granted until February 24,
16 2010 to file its reply to the opposition to its motion to amend.

17 DATED: February 22, 2010 at Woodburn, Oregon.

18
19 ORRIN L. GROVER, P.C.
20 /s/ Orrin L. Grover
ORRIN L. GROVER, OSB NO. 78010

21 Attorney for Plaintiff Intervenors
22 Appearing Pro Haec Vice
LIBERTARIAN LP OF WASHINGTON
23 STATE, RUTH BENNETT, and J. S. MILLS
Email: orrin@oringrover.com

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JOHN S. MILLS, WSBA #15842
Attorney for Plaintiff Intervenors
LIBERTARIAN LP OF WASHINGTON
STATE, RUTH BENNETT, and J. S. MILLS
Email: jmillslaw@gmail.com

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CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2010, I electronically filed the foregoing Plaintiffs' Motion to File the First Amended Complaint for the Plaintiff Libertarian Party, with the clerk of the Court using the CM/ECF system which will send notification of such filing electronically to the following:

- David T. McDonald and Jay Carlson, attorneys for the Democratic Central Committee;
- John J. While, Jr., attorneys for the Washington Republican Party;
- Rob McKenna, Attorney General;
- Maureen A. Hart, Solicitor General;
- James K. Pharris, Sr. Assistant Attorney General; and
- Jeffrey T. Even, Assistant Attorney General;
- Thomas F. Ahearne, Attorney for Defendant-Intervenor Washington State Grange;

DATED this 22nd day of February, 2010.

/s/ Orrin L. Grover
Orrin L. Grover
In Pro Haec Vice