

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.

UNOPPOSED MOTION FOR ENLARGEMENT OF TIME

Respondent Douglas County Victory Fund moves for a 14-day extension of time to respond to the Administrative Complaint filed by the Elections Division. Counsel for Respondent has conferred with counsel for the Elections Division who does not oppose the requested extension.

Respondent requests this extension of time because counsel for Respondent requires additional time to prepare an anticipated motion to dismiss the Administrative Complaint. Undersigned counsel has, since the Administrative Complaint was filed, been pressed on several urgent matters including an emergency petition for writ of certiorari to the U.S. Supreme Court filed this afternoon (*Doe v. Second Judicial District Court of the State of Nevada*, Supreme Court Case No. Pending, Nevada Supreme Court Case No. 89277) and preparation for oral argument before the United States District Court for the District of Columbia set for this Thursday, May 22 in *Green v. Department of the Air Force*, Case No.

24-1590 (RDM).

Respondent requests this short extension to permit its counsel to prepare the motion to dismiss. No party will be prejudiced by this short extension and Respondent has not requested any other extensions in this matter.

WHEREFORE Respondent moves for a fourteen-day enlargement of time through and including Monday, June 2, 2025 to respond to the Administrative Complaint.

Respectfully submitted this 19th day of May, 2025

FIRST & FOURTEENTH PLLC

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CERTIFICATE OF SERVICE

This is to certify that I will cause the foregoing to be served this 19th day of May, 2025, by email and/or U.S. mail, addressed as follows:

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/s/ Christopher O. Murray