

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 7-day enlargement of time to reply in support of its motion to dismiss. 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 the reply in support. Undersigned counsel has, since the response in opposition to the motion to dismiss was filed on July 3, been pressed on two urgent matters: work related to his service as counsel and investigative designee to the University of Colorado Board of Regents in a matter involving the censure of a member of the Board of Regents and to his role as counsel to the Kansas Public Disclosure Commission in *Kansans for Constitutional Freedom v. Kobach, et al.*, (Case No. 25-2265-DDC-GEB) (a challenge to Kansas House Bill 2016 (which bans foreign contributions to elections considering amendments to the Constitution of the State of Kansas). Counsel has been involved in

assisting his client in preparing for an upcoming rulemaking implementing the challenged legislation.

Respondent requests this short extension to permit its counsel to complete preparation of the reply in support of the motion to dismiss. No party will be prejudiced by this short extension. While both Respondent and the Elections Division have requested and been granted extensions in this matter, as the counsel for the Elections Division has noted, the disputes in this matter are almost exclusively legal and not factual. Therefore a short extension to permit completion of the briefing on the motion to dismiss is in the interest of the parties and the Hearing Officer.

WHEREFORE Respondent moves for a seven-day enlargement of time through and including Thursday, July 24, 2025 to reply in support of its motion to dismiss.

Respectfully submitted this 17th day of July, 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 17th day of July, 2025, by email and/or U.S. mail, addressed as follows:

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