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SIRI A. WOODS
CHELAN COUNTY CLERK

THE HONORABLE T.W. SMALL
Hearing: **Wednesday January 12, 2005 at 2 p.m.**

SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR CHELAN COUNTY

Timothy Borders et al., Petitioners, v. King County et al., Respondents, and Washington State Democratic Central Committee, Applicant Intervenor-Respondent.	NO. 05-2-00027-3 WASHINGTON STATE DEMOCRATIC CENTRAL COMMITTEE'S MOTION TO SHORTEN TIME

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I. RELIEF REQUESTED

The Washington State Democratic Central Committee ("WSDCC") hereby moves this Court for an order shortening time for the consideration of its Motion to Intervene. WSDCC requests that this motion be heard on January 12, 2005, at 2:00 p.m., together with its Motion to Intervene.

Title of underlying motion:	Motion to Intervene	
Moving party:	Washington State Democratic Central Committee	
If motion to shorten time is not granted, underlying motion would be noted for the Court's calendar for:	Friday:	January 21, 2005
Date when moving party seeks to have the Court rule on Motion to Shorten Time:	Wednesday:	January 12, 2005 at 2:00 p.m.
Date on which moving party seeks to have the Court consider merits of underlying motion:	Wednesday:	January 12, 2005 at 2:00 p.m.

II. STATEMENT OF FACTS

On January 7, 2005, petitioners filed this election contest and also a Motion for Expedited Discovery. The motion is noted for Friday, January 14, 2005. In the motion, petitioners make proposals that would result in the following timeline for this case:

Monday:	January 10, 2005	Petitioners serve discovery requests
Wednesday:	January 12, 2005 at noon	Any opposition to petitioners' Motion for Expedited Discovery due, LR 7(b)(1)(C)
Thursday:	January 13, 2005 at noon	Any reply to petitioners' Motion for Expedited Discovery due, LR 7(b)(1)(C)
Friday:	January 14, 2005 at 9:30 a.m.	Hearing on petitioners' Motion for Expedited Discovery
Thursday:	January 20, 2005	Responses to written discovery due if the Court grants the Motion for Expedited Discovery

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Thursday:	January 27, 2005	RCW 29A.68.050 merits hearing held by this date, which is 20 days after the contest filed

Thus, petitioners propose to begin discovery immediately and to have this contest decided within approximately three weeks. An order shortening time is appropriate in this instance because, in the absence of such an order, the underlying motion—the Motion to Intervene—would not be heard until January 21, 2005, which is two weeks into the three-week period. In order to meaningfully defend its interests, participate in discovery, and prepare for any merits hearing, WSDCC needs to be able to intervene now, before the Court hears the Motion for Expedited Discovery. Without a ruling in advance of that hearing, WSDCC will not know if it is entitled to appear in Court and make arguments concerning the Motion for Expedited Discovery. For these reasons, WSDCC respectfully moves this Court for an order shortening time to allow the Court to consider and rule on WSDCC's Motion to Intervene prior to petitioners' Motion for Expedited Discovery.

III. STATEMENT OF ISSUES

Should WSDCC's Motion to Intervene be heard on shortened time on January 12, 2005 at 2:00 p.m.

IV. EVIDENCE RELIED UPON

This motion is based upon WSDCC's Motion to Intervene filed concurrently herewith and on the pleadings and motions already of record.

V. LEGAL AUTHORITY

This motion is based on Civil Rules 6 and 7 and Local Rule 7(b)(1)(F).

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VI. CONCLUSION

For the reasons set forth above, WSDCC respectfully requests that the Court grant its Motion to Shorten Time to consider its Motion to Intervene.

DATED: January 10, 2005.

PERKINS COIE LLP

By _____

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