

1 EXPEDITE
2 No Hearing Set
3 Hearing is Set:
4 Date:
5 Time:.
6 The Honorable

7 **STATE OF WASHINGTON**
8 **THURSTON COUNTY SUPERIOR COURT**

9 In re:
10 CHALLENGE TO THE BALLOT
11 TITLE AND SUMMARY OF
12 INITIATIVE NO. 1639

NOS. 18-2-02506-34
18-2-02551-34
18-2-02564-34
18-2-02579-34

11 AGREED MOTION AND PROPOSED
12 ORDER CONSOLIDATING
13 CHALLENGES TO THE BALLOT
14 TITLE AND SUMMARY FOR
15 INITIATIVE NO. 1639

16 **AGREED MOTION**

17 Pursuant to Thurston County Local Rules 7(e), 42(a), and the Notice of Assignment and
18 Notice of Ballot Appeal Deadlines filed in each of the above-captioned cases, the parties hereby
19 jointly request that the Court enter an order consolidating Cause No. 18-2-02506-34,
20 No. 18-2-02551-34, No. 18-2-02564-34, and 18-2-02579-34. These four pending matters address
21 the ballot title and summary for the same initiative. The parties propose these matters be
22 consolidated. The parties agree that a joint hearing on the four matters will serve the interests of
23 judicial economy and avoid the potential for conflicting, non-appealable orders.

24 The parties note that all scheduling questionnaires have been filed with the court.

25 DATED this 21st day of May 2018.
26

1 ROBERT W. FERGUSON
Attorney General

2 s/ Anne E. Egeler
3 ANNE E. EGELER, WSBA 20258
Deputy Solicitor General
4 PO Box 40100
Olympia, WA 98504-0100
5 Anne.E1@atg.wa.gov
(360) 753-7085

s/ Glen Morgan (per telephone approval)
GLEN MORGAN, pro se
glen@wethegoverned.com
(360) 791-6556

s/ Joe Wilson (per telephone approval)
JOE WILSON, pro se
Joe@pedersonbros.com

6
7
8
9 s/ Gregory Wong (per telephone approval)
GREGORY J. WONG, WSBA 39329
10 NICHOLAS W. BROWN, WSBA 33586
SARAH S. WASHBURN, WSBA 44418
11 Pacifica Law Group LLP
1191 Second Avenue, Suite 2000
12 Seattle, WA 98101-3404
Greg.Wong@pacificallawgroup.com
13 Nicholas.brown@pacificallawgroup.com
Sarah.washburn@pacificallawgroup.com

s/ Eric A. Lindberg (per telephone approval)
ERIC A. LINDBERG
STEVEN W. FOGG
Corr Cronin Michelson
1001 Fourth Avenue, Suite 3900
Seattle, WA 98154-1051
Elindberg@corrchronin.com
sfogg@corrchronin.com

1 **ORDER**
2 **[PROPOSED]**

3 BASED upon the foregoing agreed motion, it is hereby ORDERED:

4 Cause No. 18-2-02506-34, No. 18-2-02551-34, No. 18-2-02564-34, and
5 No. 18-2-02579-34, all challenges to the ballot title and summary for Initiative No. 1639, are
6 consolidated into the first-filed case, Cause No. 18-2-02506-34.

7 It is further ORDERED:

8 The previously issued scheduling orders shall apply. The final hearing is set for
9 _____, 2018.

10 DATED this _____ day of May 2018.

11 _____
12 Thurston County Superior Court Judge

13 Presented by:

14 ROBERT W. FERGUSON
15 *Attorney General*

16 *s/ Anne E. Egeler*
17 ANNE E. EGELER, WSBA 20258
18 *Deputy Solicitor General*
19 PO Box 40100
20 Olympia, WA 98504-0100
21 Anne E1@atg.wa.gov
22 (360) 753-7085

s/ Glen Morgan (per telephone approval)
23 GLEN MORGAN, pro se
24 glen@wethegoverned.com
25 (360) 791-6556

s/ Joe Wilson (per telephone approval)
26 JOE WILSON, pro se
Joe@pedersonbros.com

s/ Gregory Wong (per telephone approval)
27 GREGORY J. WONG, WSBA 39329
28 NICHOLAS W. BROWN, WSBA 33586
29 SARAH S. WASHBURN, WSBA 44418
30 Pacifica Law Group LLP
31 1191 Second Avenue, Suite 2000
32 Seattle, WA 98101-3404
33 Greg.Wong@pacificallawgroup.com
34 Nicholas.brown@pacificallawgroup.com
35 Sarah.washburn@pacificallawgroup.com

s/ Eric A. Lindberg (per telephone approval)
36 ERIC A. LINDBERG
STEVEN W. FOGG
Corr Cronin Michelson
1001 Fourth Avenue, Suite 3900
Seattle, WA 98154-1051
Elindberg@corrchronin.com
sfogg@corrchronin.com

1 **CERTIFICATE OF SERVICE**

2 I certify, under penalty of perjury under the laws of the state of Washington, that on this
3 date I served a true and correct copy of the foregoing document via electronic mail upon the
4 following:

5 Joe Wilson
6 Joe@pedersonbros.com

7 Nick Brown
8 Gregory Wong
9 Sarah S. Washburn
10 Pacifica Law Group, LLP
11 1191 Second Avenue, Suite 2000
12 Seattle, WA 98101-3404
13 Greg.Wong@pacificallawgroup.com
14 Nicholas.brown@pacificallawgroup.com
15 Sarah.Washburn@pacificallawgroup.com

16 Glen Morgan
17 glen@wethegovened.com

18 Eric A. Lindberg
19 Steven W. Fogg
20 Corr Cronin Michelson
21 1001 Fourth Avenue, Suite 3900
22 Seattle, WA 98154-1051
23 Elindberg@corrchronin.com
24 sfogg@corrchronin.com

25 DATED this 21st day of May 2018.

26 *s/ Kristin D. Jensen*
KRISTIN D. JENSEN
Confidential Secretary