

From: Mimi Robson <hmrobson@ca.lp.org>
Date: Tue, 27 Aug 2019 17:02:42 -0700
Subject: lpcjc-201908-Imhoff

Dear Judicial Committee Chairperson,

As party / interested parties to the Imhoff appeal, we request that the hearing the JC has currently set for Thursday September 5 be moved to September 17 in order to allow all responding parties sufficient time to respond, to allow all opposing parties and the Committee to review the responses, and in order to have a legitimate "trial" of the issues. We request this not only to give the parties seeking relief a full and meaningful opportunity to respond, but also to ensure there is no lack of process that would diminish the legitimacy of the judicial action taken here.

Today the JC gave notice of the Imhoff appeal. Also today, the JC gave notice of a hearing set for Sept 5, 2019, which is only 10 days from today. As responding parties, we request 2 weeks to prepare our response. Additionally, we would like the JC and those opposing our response time to review, and if they wish, to have time to rebut in writing prior to the hearing. In order to do this, we request a deadline for responses to the appeal to be Sept 9, 2019, replies to the responses to be due Sept 14, 2019. And the hearing to be set for Sept 17, 2019.

The Imhoff "Notice of Appeal" with today's date alleges various things that cannot be properly adjudicated without a full response. Specifically for example, the plaintiffs have alleged their rights to due process were "suppressed", that the "charges" were not properly submitted, the chair failed to create an investigation by committee, etc.

Since the Plaintiffs are alleging that they didn't know what they were charged with, how the charges were handled, and that the decision made by the Committee was out of order, we need to offer evidence that supports the for "cause" decision that was made, starting with why and how it was initiated, how it was executed, how it was disposed of, as well as the rules which were followed in this process. It is our intention to provide evidence of the specific charges, how the plaintiffs were notified, what information was provided, what evidence was used to back it up, how the committees investigated the matter and how the decisions were made within the procedures required by our rules. This will take time to prepare. We assure the JC that all this information is reasonably available. We'd like time to obtain it and prepare it in a way that effectively addresses the full scope of what happened, and not just the allegations of defective procedure.

I believe the timeline requested above would allow all the parties a full opportunity to respond, so that a decision can be rendered legitimately on the merits.

We therefore respectfully ask the committee to reconsider the hearing date, and accept our proposed timeline.

Sincerely,

Brent Olsen, LPC Vice-Chair
Steven Haug, LPC Treasurer
Wendy Hewitt, LPC Southern Area Coordinator
Chuck Hamm, LPC At-Large Member

[Honor "Mimi" Robson signature image]