

**Supreme Court
of the State of Washington**

In re:

Petition for Recall of John
Pais, et al.

No. 101490-2

**Reply in Support of Motion
for Order with Opinion to
Follow**

1. Reply Argument

The Appellants will not be prejudiced in their ability to discuss the recall or gather support. They have known for months what the charges are and have had plenty of time to formulate their defensive strategies and try to gather support to their side.

This Court's Opinion will not change the nature of the charges or the Appellants' defenses. The constituents' signatures and votes will not be based on what the Opinion will say about the legal niceties of

why a particular charge is or is not legally or factually sufficient to go forward. That information is irrelevant to the decision of whether to sign a petition or how to vote. The constituents will act based on the *substance of the charges*. The substance of the charges has been known for months. The Appellants need neither more time nor more information.

The only thing the parties need to know in order to proceed with the recall effort—or the defense thereof—is which charges will or will not be going forward. The Court can communicate that information in an Order, with the Opinion to follow, as it has done many times in the past.

2. Conclusion

The Court should promptly issue an Order announcing its decision in this case, with an Opinion to be filed in due course.

I certify that this document contains 221 words.

Submitted this 21st day of March, 2023.

/s/ Kevin Hochhalter

Kevin Hochhalter, WSBA #43124

Attorney for Respondents

kevin@olympicappeals.com

Olympic Appeals PLLC

4570 Avery Ln SE #C-217

Lacey, WA 98503

Certificate of Service

I certify, under penalty of perjury under the laws of the State of Washington, that on March 21, 2023, I caused the foregoing document to be filed with the Court and served on counsel listed below by way of the Washington State Appellate Courts' Portal.

Aaron T. Haynes
Richard A. Davis
1500 Railroad Avenue
Bellingham, WA 98225
ahaynes@chmelik.com
rdavis@chmelik.com

SIGNED at Lacey, Washington, this 21st day of March, 2023.

/s/ Rhonda Davidson
Rhonda Davidson, Paralegal
rhonda@olympicappeals.com
Olympic Appeals PLLC
4570 Avery Lane SE, #C-217
Lacey, WA 98503
360-763-8008

OLYMPIC APPEALS PLLC

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Appellate Court Case Title: In Re the Petition for Recall of John Pais et al.
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The following documents have been uploaded:

- 1014902_Answer_Reply_20230321154138SC463681_6195.pdf
This File Contains:
Answer/Reply - Reply to Answer to Motion
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Filing on Behalf of: Kevin Hochhalter - Email: kevin@olympicappeals.com (Alternate Email: rhonda@olympicappeals.com)

Address:
4570 Avery Ln SE #C-217
Lacey, WA, 98503
Phone: (360) 763-8008

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