

No. 102814-8

**SUPREME COURT FOR
THE STATE OF WASHINGTON**

JEWELS HELPING HANDS and BEN STUCKART,
Appellants,

vs.

BRIAN HANSEN, CITY OF SPOKANE, SPOKANE
COUNTY, and VICKY DALTON, in her official capacity as
auditor for Spokane County,
Respondents.

**MOTION OF GREATER SPOKANE INC. AND
DOWNTOWN SPOKANE PARTNERSHIP FOR LEAVE
TO FILE BRIEF OF AMICI CURIAE**

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Greater Spokane Inc. and
Downtown Spokane
Partnership*

Pursuant to Rule of Appellate Procedure 10.6, the listed parties would request to submit the brief attached hereto and in support would show:

I. IDENTITY AND INTEREST OF MOVING PARTIES

Proposed *amici* Greater Spokane Inc. (“GSI”) is the Spokane region’s leading business development and advocacy organization, focused on building their economy and creating a thriving Spokane region. It serves as the Spokane Regional Chamber of Commerce and Economic Development organization that supports the success of businesses of all sizes across the Inland Northwest.

Proposed *amici* Downtown Spokane Partnership (“DSP”) is a private, not for profit, 501(c)6 membership organization that serves as Spokane's central city advocate and service provider, dedicated to advancing the quality and vitality of Downtown Spokane as the basis for a healthy region. The DSP fosters economic development and neighborhood revitalization by advocat-

ing for policies that improve prospects for current and future economic growth.

Proposed *amici* have a strong interest in the outcome of this case, as they are committed to the economic health and prosperity of all Spokanites. Specifically, GSI and DSP worry that invalidating Spokane’s Proposition No. 1 (“Proposition” or “Section 1010”), despite its legal and proper enactment via initiative, will severely impede—if not entirely extinguish—its members’ capacity to address the homelessness crisis and its impacts in their community. Striking this Ordinance would deprive the voters of Spokane of their voice. Proposed *amici* are vitally interested in the proper interpretation of state protecting the power of the local initiative process and ensuring that the changes to Spokane’s camping ordinance made in the Proposition remain in place and that the right of the people to legislate by initiative is not undermined and compromised.

II. STATEMENT OF RELIEF SOUGHT

Proposed *amici* seek leave to file the brief, which is filed

contemporaneously with this Motion in support of Appellant.
RAP 10.6.

III. FACTS RELEVANT TO MOTION

Proposed *amici* are aware of Appellant's appeal in this matter, and have prepared the annexed brief.

IV. ARGUMENT

RAP 10.6 permits the filing of an *amicus curiae* brief. Proposed *amici* are familiar with the parties' briefing on review. They believe that they can provide a larger perspective for the Court on the impact of recent U.S. Supreme Court decisions and state constitutional law on the matter pending before the Court.

V. CONCLUSION

In accordance with RAP 10.6, proposed *amici* respectfully ask the Court to grant it leave to file its *amicus curiae* brief.

This document contains 402 words, excluding the parts of the document exempted from the word count by RAP 18.17.

DATED this 2nd day of August, 2024.

Respectfully submitted,

/s/ Jackson Maynard

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DECLARATION OF SERVICE

I, Paige Jaramillo, hereby declare under penalty of perjury under the laws of the State of Washington, that on August 2, 2024, I electronically filed the foregoing document via the Washington State Appellate Courts' Secure Portal, which will send e-mail notifications of such filing to all parties of record.

Signed in Olympia, Washington, this 2nd day of August, 2024.

/s/ Paige Jaramillo
Paige Jaramillo