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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
COUNTY OF KITSAP

IRON MOUNTAIN QUARRY, LLC, a )  
Washington Limited Liability Company, and ) No. 10-2-00181-5  
POPE RESOURCES, a Delaware Limited )  
Partnership; ) MOTION TO INTERVENE  
Petitioners/Plaintiffs, ) UNDER CR 24  
vs. )  
JEFFERSON COUNTY, a Washington )  
Municipal Corporation, acting through its )  
Department of Community Development; and )  
STACIE L. HOSKINS, Planning Manager, )  
Jefferson County Department of Community )  
Development; )  
Respondents/Defendants. )  
AND )  
PORT LUDLOW VILLAGE COUNCIL, )  
Intervener. )

TO: CLERK OF THE COURT;  
AND TO: Dale N. Johnson and Keith Moxon at GordonDerr LLP, Attorneys for  
Plaintiffs;  
AND TO: Kenneth W. Harper and Quinn N. Plant at Menke Jackson Beyre Ehlis &  
Harper, LLP, Attorneys for Defendants.

THE PORT LUDLOW VILLAGE COUNCIL, Intervener, by and through its attorneys,  
Powers & Therrien, P.S., hereby moves the court for an Order allowing it to intervene in the  
above-captioned matter pursuant to CR 24(a) on the basis that Intervenor has a material affected

MOTION TO INTERVENE - 1

Leslie A. Powers  
Powers & Therrien, P.S.  
3502 Tieton Drive  
Yakima, WA 98902  
Phone (509) 453-8906  
Fax (509) 453-0745

1 interest in the subject matter, that Intervenor has a derivative basis to intervene as the  
2 representative body for more than sixteen hundred property owners in the Port Ludlow Master  
3 Planned Resort that is in the immediate vicinity of the proposed New Shine Quarry and that has  
4 rights and amenities that are directly affected thereby, that the transportation, domestic water  
5 interests, and interests in the continuation of the area of the New Shine Quarry as a commercial  
6 forest under applicable Jefferson County overlay are directly affected by the proposed New  
7 Shine Quarry, that Intervenor has standing to intervene based upon its participation as a party in  
8 the LUPA action relating to the New Shine Quarry which is the basis for this action, that  
9 Jefferson County cannot adequately represent the interest of Intervenor or the Port Ludlow  
10 Master Planned Resort, and that this motion to intervene is timely because no substantive  
11 motions have been decided in the action. The factual and legal basis for this Petition are more  
12 fully set forth in the Memorandum of Points and Authorities and the Declaration of Anthony  
13 Simpson with Exhibits thereto that are filed contemporaneous herewith.

14 DATED this 26<sup>th</sup> day of August, 2010.

15 POWERS & THERRIEN, P.S.

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18 

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Leslie A. Powers

19 WSBA #06103

20 *Attorney for Intervener*

CERTIFICATE OF SERVICE

I certify under penalty of perjury under the laws of the State of Washington, that on this day I served a true copy of this document on the Respondent/Defendant named herein, by and through the attorney of record, properly addressed as follows:

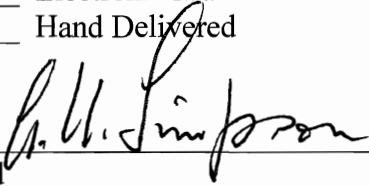
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- Federal Express
- United Parcel Service
- Facsimile Transmission
- Electronic Mail
- Hand Delivered

Signed



Date

8/26/2010

Anthony U. Simpson

MOTION TO INTERVENE - 3

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