# BEFORE THE COMMISSION ON JUDICIAL CONDUCT AND ETHICS STATE OF WYOMING

An inquiry concerning	)	COMMISSIC	ON ON JUDIO TO TOUCT
The Honorable Ruth Neely	)		AND ETTE: Official Record
Municipal Court Judge and Circuit Court Magistrate Ninth Judicial District Pinedale, Sublette County	) ) ) )		Wendy J. Sot

# CJCE'S MOTION FOR PARTIAL SUMMARY JUDGMENT

COMES NOW the Commission on Judicial Conduct and Ethics, by and through its disciplinary counsel, Patrick Dixon, and hereby moves the Adjudicatory Panel for partial summary judgment on the issues of whether Judge Neely has violated Canon I and Rules 1.1 and 1.2 and Canon II and Rules 2.2 and 2.3 of the Wyoming Code of Judicial Conduct. This motion is on the grounds and for the reasons that there exist no genuine issues of material fact and that the CJCE is entitled to a determination on these issues, as a matter of law. This motion is based upon the pleadings of records, counsel's Memorandum in Support of Motion for Partial Summary Judgment and discovery materials appended thereto.

DATED this 30 day of October, 2015.

Patrick Dixon (Wyo. Bar #5-1504)

104 S. Wolcott, Suite 600

Casper, Wyoming 82601

(307) 234-7321

(307) 234-0677 (facsimile)

Disciplinary Counsel

#### CERTIFICATE OF SERVICE

I, Patrick Dixon, do hereby certify that on the 30 day of October, 2015, I served the above and foregoing CJCE's Motion for Partial Summary Judgment via email or U.S. mail, postage prepaid, as noted below:

#### VIA EMAIL

### dobylaw@embarqmail.com

Herbert K. Doby
Attorney at Law
P.O. Box 130
Torrington, Wyoming 82240

## VIA EMAIL kconnelly@adflegal.org

James A. Campbell Kenneth J. Connelly Douglas G. Wardlow Alliance Defending Freedom 15100 N. 90<sup>th</sup> Street Scottsdale, Arizona 85260

#### VIA EMAIL

# orchard@spencelawyers.com

Melvin C. Orchard, III
Presiding Officer/Hearing Officer
The Spence Law Firm, LLC
Spence & McCalla
P.O. Box 548
Jackson, Wyoming 83001-0548

#### VIA U.S. MAIL

Wendy Soto, Executive Director Commission on Judicial Conduct and Ethics P.O. Box 2645

Cheyenne, WY 82003

Patrick Dixon