

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT ANCHORAGE

ALASKA STATE EMPLOYEES
ASSOCIATION/AMERICAN
FEDERATION OF STATE, COUNTY
AND MUNICIPAL EMPLOYEES
LOCAL 52,

Plaintiff,

vs.

STATE OF ALASKA, DEPARTMENT
OF ADMINISTRATION,

Defendant.

Case No.: 3AN-25-04636CI

CONDITIONAL REQUEST FOR EVIDENTIARY HEARING

Plaintiff Alaska State Employees Association/American Federation of State, County and Municipal Employees Local 52 (“ASEA”), by and through counsel Cashion Gilmore & Lindemuth, respectfully makes a conditional request for an evidentiary hearing, to occur either at or after oral argument on ASEA’s motion for preliminary injunction on Wednesday, March 5, if the Court deems it necessary.

ASEA believes that its request for a preliminary injunction can be granted on the record before this Court. But if there is any issue of fact that concerns the Court, ASEA

Cashion Gilmore & Lindemuth
510 L Street, Suite 601
Anchorage, Alaska 99501
(907) 222-7932 fax (907) 222-7938

should be allowed to present evidence, and cross-examine the State's witnesses, at an evidentiary hearing.¹

Respectfully submitted this 3rd day of March, 2025.

CASHION GILMORE & LINDEMUTH
Attorneys for Plaintiff

/s/ Scott Kendall
Scott Kendall
Alaska Bar No. 0405019
Jahna M. Lindemuth
Alaska Bar No. 9711068
Samuel G. Gottstein
Alaska Bar No. 1511099

CERTIFICATE OF SERVICE

I hereby certify that on March 3, 2025, a copy of the foregoing document was served via email on the following attorneys of record:

Lael Harrison
Senior Assistant Attorney General
State of Alaska, Department of Law
lael.harrison@alaska.gov

Robert Bacaj
Assistant Attorney General
State of Alaska, Department of Law
robert.bacaj@alaska.gov

CASHION GILMORE & LINDEMUTH

By: /s/ Todd Cowles

¹ See, e.g., *Randle v. Bay Watch Condo. Ass'n*, 488 P.3d 970, 972, 974-95 (Alaska 2021) (noting favorably that the superior court granted a preliminary injunction “after an evidentiary hearing”).