

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

ARCTIC VILLAGE COUNCIL,  
LEAGUE OF WOMEN VOTERS OF  
ALASKA, ELIZABETH L. JONES, and  
BARBARA CLARK,

Plaintiffs,

v.

KEVIN MEYER, in his official capacity  
as the Lieutenant Governor of the State of  
Alaska; GAIL FENUMIAI, in her official  
capacity as the Director of the Alaska  
Division of Elections; and ALASKA  
DIVISION OF ELECTIONS,

Defendants.

Case No. 3AN-20- 078861

STATE OF ALASKA  
THIRD JUDICIAL DISTRICT  
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**PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Plaintiffs request that the Court preliminarily enjoin AS 15.20.066(b)(2) and 15.20.081(d), and 6 AAC 25.550 and 6 AAC 25.680 in the upcoming November 3, 2020 general election and during the COVID-19 pandemic. In support of this Motion, Plaintiffs will rely on the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Injunction; the Declarations of Tiffany Yatlin of Arctic Village Council (Exhibit A), Judy Andree of the League of Women Voters of Alaska (Exhibit B), Elizabeth L. Jones (Exhibit C), and Barbara Clark (Exhibit D); a Letter to Defendants' Meyer and Feumiai dated August 31, 2020 (Exhibit E); and a Response Letter from Defendants Meyer and Fenumiai dated September 4, 2020 (Exhibit F).

**NATIVE AMERICAN RIGHTS FUND**

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Fax (907) 276-2466

DATED this 8<sup>th</sup> day of September, 2020, at Anchorage, Alaska.



Natalie A. Landreth, Alaska Bar No.  
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Matthew N. Newman, Alaska Bar No.  
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*Counsel for Plaintiffs League of Women  
Voters Alaska, Elizabeth Jones, and  
Barbara Clark*

\*Pro Hac Vice forthcoming under Rule  
81(a)(2)



**CERTIFICATE OF SERVICE**

I hereby certify that on this 5<sup>th</sup> day of September, 2020, I mailed by Certified Mail and emailed a true and correct copy of the foregoing motion and attached memorandum of law in support to:

Kevin Meyer  
Lieutenant Governor  
P.O. Box 110001  
Juneau, AK 99811-0001

550 West 7th Avenue, Suite 1700  
Anchorage, AK 99501  
kevin.meyer@alaska.gov

Gail Fenumiai  
Director, Alaska Division of Elections  
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Clyde Ed Sniffen  
Acting Attorney General  
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Anchorage, AK 99501  
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By: 

Matthew Newman  
Alaska Bar No. 1305023

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Case No. 3AN-20-\_\_\_\_\_

**[PROPOSED] ORDER GRANTING  
PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION**

Having considered Plaintiffs' Motion for Preliminary Injunction and  
Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Injunction and the  
accompanying Exhibits, IT IS HEREBY ORDERED that the Motion is GRANTED.

The Witness Requirement, codified at AS 15.20.066(b)(2) and 15.20.081(d), and 6  
AAC 25.550 and 6 AAC 25.680, is unconstitutional and invalid during the COVID-19  
pandemic because it violates Plaintiffs' rights under Article 5, Section 1 and Article 1,  
Section 1 of the Alaska Constitution. Defendants are preliminarily and permanently  
enjoined from enforcing the Witness Requirement in the November 3, 2020 general  
election and during future elections held during the COVID-19 pandemic.

**NATIVE AMERICAN RIGHTS FUND**

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DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2020 at Anchorage, Alaska.

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