

anc.law.ecf@alaska.gov

**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.)

**FILED in the TRIAL COURTS
STATE OF ALASKA, THIRD DISTRICT**

OCT 07 2020

**Clerk of the Trial Courts
By _____ Deputy**

Case No.: 3AN-20-07858 CI

**STATE'S RESPONSE REGARDING PLAINTIFFS' PROPOSED
PRELIMINARY INJUNCTION ORDER**

The State and the plaintiffs have filed nearly identical proposed preliminary injunction orders pursuant to this Court's October 5, 2020 order. Because the parties' negotiations fell apart at the last moment, the two filings offer no explanation for the difference in the parties' language and why agreement was not reached on that language.

The plaintiffs' proposed order directs that: "In the event the Supreme Court of Alaska affirms this Court's injunction or denies Defendants' petition for review to the Supreme Court, Defendants will be *one-hundred percent prepared and ready to effectuate immediately all the relief set forth in this Order, without further delay...*" The State sought clarification about the plaintiffs' intent regarding the relief ordered in

paragraphs 2 and 10 of the proposed order, noting its unwillingness to send mailers to the printer and attempt to change already-prepared television ads in advance of a final decision regarding the preliminary injunction, because the former would involve potentially unnecessary expenditure of state resources and the latter would be difficult to undo promptly. The plaintiffs confirmed that it was their intent that these measures would be initiated before the Supreme Court issued its decision and, therefore, the State declined to agree to their language.

The State would be willing to pre-print a mailer in advance of the Supreme Court's decision if the plaintiffs are required to post a bond to cover the cost. The State estimates this cost would be \$39,000 (Thirty-Nine Thousand Dollars).

DATED October 6, 2020.

CLYDE "ED" SNIFFEN, JR.
ACTING ATTORNEY GENERAL

By: s/Lael Harrison/
Lael Harrison
Alaska Bar No. 0811093
Margaret Paton Walsh
Alaska Bar No. 0411074
Assistant Attorneys General

CERTIFICATE OF SERVICE

I hereby certify, that on this date, copies of the above State's Response Regarding Plaintiffs' Notice of Proposed Preliminary Injunction were served via email on the following:

Arctic Village Council, et al. v. Kevin Meyer, et al.
State's Response Re: Plaintiffs' Proposed Order
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Case No. 3AN-20-07858 CI

Natalie A. Landreth
Matthew N. Newman
Wesley J. Furlong
Native American Rights Fund
nlandreth@narf.org
mnewman@narf.org
wfurlong@narf.org

Ezra D. Rosenberg
Pooja Chaudhuri
Natasha Chabria
Lawyers' Committee for Civil Rights Under
Law
erosenberg@lawyerscommittee.org
pchaudhuri@lawyerscommittee.org
nchabria@lawyerscommittee.org

Stephen Koteff
Joshua Decker
Aadika Singh
ACLU of Alaska Foundation
skoteff@acluak.org
jdecker@acluak.org
asingh@acluak.org

Dale E. Ho
American Civil Liberties Union
dho@aclu.org

| | |
|-------------------------|----------------|
| <u>s/Lael Harrison/</u> | <u>10.6.20</u> |
| Lael Harrison | Date |