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**SUPERIOR COURT FOR THE STATE OF ALASKA**  
**FIRST JUDICIAL DISTRICT AT JUNEAU**

ERIC FORRER )  
Plaintiff, )

vs. )

STATE OF ALASKA )  
and LUCINDA MAHONEY, )  
Commissioner of the Alaska )  
Department of Revenue )  
in her capacity as an official )  
of the State of Alaska. )  
Defendants. )

1JU-20-00644 Civil

FILED in the Trial Courts  
State of Alaska First District  
at Juneau  
MAY 22 2020  
Clerk of the Trial Courts  
By 1 Deputy

**WITHDRAWAL OF MOTION FOR EQUITABLE RELIEF AND**  
**REQUEST FOR A STATUS CONFERENCE AND/OR SCHEDULING**  
**CONFERENCE**

Eric Forrer ("Forrer"), through counsel and on behalf of the public interest, responds to the Order by this court dated May 20, 2020.

In regard to the point made by the court pertaining to withdrawal of Forrer's pending application for a preliminary injunction, Forrer withdraws his request for equitable relief in the form of a preliminary injunction.

Forrer having specifically reserved the ability to challenge the legislature's purported ratification of the CARES Act funds made on May 20, 2020, seeks prospective declaratory and/or equitable relief in the form of a permanent injunction. Given the significance of the underlying constitutional

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2 issues presented in this case, Forrer requests the court schedule and conduct a  
3 status conference at a time convenient for the court on May 26 – 28, 2020, for  
4 the purpose of discussing whether there are factual issues in dispute, a  
5 compressed discovery schedule, whether stipulations pertaining to any  
6 outstanding factual issues are possible and also to set up a schedule calling for  
7 simultaneous exchange of briefs and simultaneous responsive briefing related  
8 to the constitutionality of the issues in this case.

9 **DATED** this 22th day of May, 2020 at Juneau, Alaska.

10 **LAW OFFICE OF**  
11 **JOSEPH W. GELDHOF**


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13 \_\_\_\_\_  
14 Joseph W. Geldhof  
15 Alaska Bar # 811109

16 **Certification**

17 I certify that a copy of this document was  
18 hand-delivered to the Office of the Alaska  
19 Attorney General on the sixth floor of the Dimond  
20 Courthouse in Juneau, Alaska with a request that  
21 the document be sent by electronic transmission  
22 to Margaret Patton-Walsh, Assistant Attorney  
23 General in the Attorney General's Anchorage  
24 Office who on information and belief is believed to  
25 be counsel of record for the State of Alaska and  
26 Commissioner Lucinda Mahoney in this case.

27 **DATED:** May 22, 2020

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By: \_\_\_\_\_  
Joseph W. Geldhof