

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

MUNICIPALITY OF ANCHORAGE,

Plaintiff,

v.

KRINER'S DINER, LLC, et al.,

Defendants.

Filed 8/9/2020
NK

TREAT AS ORIGINAL

Case No. 3AN-20-07394CI

**(1) DEFENDANTS' OPPOSITION TO PLAINTIFF'S MOTION FOR ORDER TO
SHOW CAUSE; (2) MOTION FOR RULE 11 SANCTIONS
AGAINST LINDA JOHNSON**

KRINER'S DINER, LLC, ANDREW KRINER, and NORANN KRINER
(hereinafter "**Kriners**") by and through the Law Offices of Blake Fulton Quackenbush,
opposes the Municipality of Anchorage's motion for an order to show cause.

I. The Motion for an Order to Show Cause must be denied.

The motion for an order to show cause should be denied because the Emergency Order 15 ("**EO-15**") is unconstitutional under the Constitution of the State of Alaska. EO-15 violates equal protection, due process, and separation of powers. Equal protection has been briefed in part in the opposition for a temporary restraining order (which the Kriners incorporate herein) and the remaining issues will be fully briefed in the answer to the complaint when it is filed.

The court signed the *Order Granting Plaintiff's Motion for Temporary Injunction* on August 7, 2020. On August 8, 2020, Andrew Kriner declined to comply with the obligations imposed by the August 7, 2020 *Order Granting Plaintiff's Motion for*

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Temporary Injunction based on a good faith belief that no valid obligation exists because EO-15 is unconstitutional. The Kriners opened Kriner's Diner on August 8, 2020 as a peaceful protest to the unconstitutional EO-15.

The Municipality of Anchorage has claimed without support that the number of COVID-19 cases has exceeded the Anchorage Health Department's capacity to rapidly trace and monitor every known case.¹ Nevertheless, Anchorage Health Department lists on its regularly updated website the locations where all persons likely came into close contact with an infected person. To date, Kriner's Diner has not been listed as such a location. According to the Anchorage Health Department, between July 27, 2020 and August 9, 2020, "[n]o current locations" were found by the Anchorage Health Department in which persons who were infected with COVID-19 spent extended time.² Specifically, as of August 9, 2020, Kriner's Diner was not listed by Anchorage Health Department as a location in which any person who was infected with COVID-19 spent extended time between at least July 27, 2020 and August 9, 2020.³

Given the Municipality of Anchorage's harassment and threats of a \$15,000 per day sanction against the Kriners—despite their having been not connection between COVID-19 infection rates and the Kriner's business—the Kriners implore the court to deny the Municipality of Anchorage's motion. A sanction of \$15,000 per day is an unreasonable sanction, given the

¹ *Motion and Memorandum in Support of Temporary Injunction* 4-5 (Aug. 5, 2020).

² *Exhibit A & Exhibit I, attached hereto.*

³ *Aff. of Andrew Kriner* ¶ 7 (Aug. 6, 2020).

circumstances, and it would effectively bankrupt the Kriners if granted by the court. The request should therefore be denied.

II. The Municipality of Anchorage's request for sanctions is frivolous, filed for an improper purpose, and must be denied.

Immediately following the hearing in the above-captioned matter on August 7, 2020 (in the presence of two legal assistants, three attorneys, an office manager, and an accountant) undersigned counsel advised the Kriners that undersigned counsel had an ethical obligation to instruct him to follow the order of the court.

Later that same afternoon, undersigned counsel received an anonymous phone call from an employee from Municipal Light and Power who explained that a municipal attorney had instructed Municipal Light and Power to "turn the power off to Kriner's Diner." Undersigned counsel called Linda Johnson, who represents the Municipality of Anchorage, and she neither confirmed nor denied the information provided by the anonymous Municipal Light and Power informant.

Undersigned counsel confirmed by phone on August 7, 2020 at 3:14 pm that the Kriners had shut down the restaurant at around 3:00 PM. At the time of the phone call with Linda Johnson, Kriners I had not received confirmation from Kriners about whether they intended to open Kriner's Diner the following morning.

Undersigned counsel's records show that it was not until the evening of August 7, 2020 that undersigned counsel had received confirmation that Kriner's Diner intended to open on Saturday, August 8, 2020 at 9:00 AM. Undersigned counsel informed the Kriners

that if the restaurant was going to open on Saturday morning, undersigned counsel would be there in case the police arrested him and also to advise him on all other legal issues.

Many patrons showed support for Kriners by arriving early and taking seats at the various booths and tables. Undersigned counsel took a video and posted it to a private Facebook group called "Save Anchorage." Many people expressed their desire to "sit-in" and demonstrate their protest to the EO-15, and the video was shown to the private Facebook group. The post was labeled "Americans peacefully protesting in a historic 'sit-in'! Breakfast is served" because that is what happened at Kriner's Diner that morning.

Undersigned counsel also posted in a private Facebook Group the following:

We have a right to work and support our families and communities. Please, if you are healthy, get out and go to businesses and encourage businesses to have the courage to work. It's crazy to think that we are fighting for a right to work and support our families!

Undersigned counsel explains in detail the circumstances surrounding the foregoing in the attached affidavit.

III. The court should levy sanctions against Linda Johnson under Alaska R. Civ. Proc. 11 for gross misrepresentations set forth in the Municipality of Anchorage's motion for an order to show cause and for filing the principal motion for an improper purpose.

The court should levy sanctions against Linda Johnson for gross misrepresentations and the improper purpose for which she made such baseless misrepresentations. Alaska Civil Rule 11 provides, in pertinent part:

By presenting to the court a pleading, written motion, or other paper—whether by signing, filing, submitting, or later advocating it—an attorney or unrepresented party certifies that

to the best of the person's knowledge, information, and belief, formed after an inquiry reasonable under the circumstances:

- (1) it is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
- (2) the claims, defenses, and other legal contentions are warranted by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law or for establishing new law; [and]
- (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery[...].

Alaska R. Civ. Proc. 11(b)(3) “requires factual claims in court filings to have evidentiary support,” and Alaska R. Civ. Proc. 11(b)(1) bars filings that are submitted for an improper purpose.⁴

Linda Johnson, representing the Municipality of Anchorage, claims that undersigned counsel’s posting of a video from inside the diner to a private Facebook group somehow violated an order that was issued against the Kriners. The court in this case has not issued any order restricting the free speech of undersigned counsel or the Kriners. “Every person may freely speak, write, and publish on all subjects [...]” according to article I sec. 5 of The Constitution of the State of Alaska.

Linda Johnson also falsely accuses undersigned counsel of aiding and abetting the commission of a crime when undersigned counsel simply exercised his freedom speech and right to assemble. Andrew Kriner confirms that the purpose of undersigned counsel’s presence at the Kriner’s Diner on Saturday 8, 2020 was to be present in case police arrested

⁴ *Kollander v. Kollander*, 400 P.3d 91, 94 (Alaska 2017).

Andrew Kriner for serving breakfast indoors, which he was not arrested, or to provide any other legal advice.⁵

For Linda Johnson to write that undersigned counsel's posting of a video in a private Facebook group is "aiding and abetting" is utter nonsense. Many people, including Chanel 2 news, were present and filmed and shared videos of the same events to others on Saturday, August 8, 2020. The Channel 2 news anchor is certainly not in violation of any order or crime, and undersigned counsel certainly is not either. Likewise, undersigned counsel's written statement in a private Facebook group about encouraging businesses to work⁶ clearly falls under free speech and is constitutionally protected speech according to Article I sec. 5 of the Constitution of the State of Alaska.

Because free speech is not illegal, it certainly is not a violation of the Rules of Professional Conduct. Andrew Kriner confirms in his affidavit that he was not advised to violate any laws. However, Andrew Kriner has a constitutionally protected right to protest unconstitutional laws, and that is what the Kriners did on Saturday, August 9, 2020. While undersigned counsel strongly maintains that undersigned counsel has constitutional rights to freely assemble and freely speak and publish that speech in a private Facebook group, he is also aware that the following is true in the official commentary under Rule 8.4 in the Rules of Professional Conduct: "A lawyer may refuse to comply with an obligation imposed by law upon a good faith belief that no valid obligation exists."

⁵ *Aff. of Andrew Kriner* ¶ 5 (Aug. 9, 2020).

⁶ *Aff. of Blake F. Quackenbush, Esq.* ¶ 8-9 (Aug. 9, 2020).

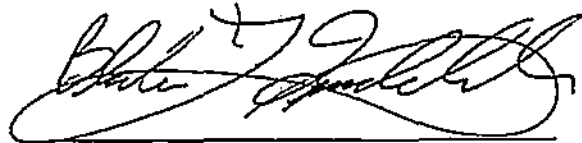
Any way you examine the law as applied to the facts presented in the Municipality of Anchorage's motion for sanctions, no wrongdoing was perpetrated on Saturday, August 9, 2020 by undersigned counsel, and Linda Johnson knows or should know that to be true. The Municipality of Anchorage's request for sanctions was done simply to get a reaction from the media to unfairly put pressure on the Kriners to comply with the unconstitutional EO-15. For these reasons, under Alaska R. Civ. Proc. 11, Linda Johnson should be sanctioned.

CONCLUSION

Based on the facts and evidence presented herein, the Kriner's request that the court deny the Municipality of Anchorage's motion for order to show cause and deny the request for sanctions. It is further requested that the court sanction Linda Johnson and order her to pay Attorney fees and costs pursuant to Alaska R. Civ. Proc. 11.

DATED this 9th day of August 2020 at Anchorage, Alaska.

LAW OFFICES OF
BLAKE FULTON QUACKENBUSH
Attorney for Kriner's Diner LLC



BLAKE F. QUACKENBUSH, ESQ.
ALASKA BAR NO. 1405040

CERTIFICATE OF SERVICE

Undersigned hereby certifies that on Aug 9, 2020 a true and correct copy of this document was served by: USPS 1st Class Mail; E-Mail; Fax; Messenger; and/or Hand Delivery to the following recipient(s):

Attn: Ruth Botstein
Attn: Linda Johnson
Municipal Attorney's Office
PO Box 196650
Anchorage AK 99519
Ruth.botstein@anchorageak.gov
Linda.johnson@anchorageak.gov

By: 
BLAKE F. QUACKENBUSH, ESQ.
ALASKA BAR NO. 1405040

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CONFIRMED COVID-19 EXPOSURE LOCATIONS

The Anchorage Health Department has confirmed that persons who were infectious with COVID-19 spent extended time in the following locations during the past 10 days on the dates specified. We are concerned that the person with COVID-19 may have transmitted the virus to others in close contact at the location. We have been unable to identify and contact everyone who may have had close contact with the infectious person at the location and who may be at risk of becoming sick.

No current locations.

IF YOU WERE IN A LOCATION ON A DATE LISTED:

- Stay away from people who are at higher risk for getting very sick from COVID-19.
- Watch for symptoms and check your temperature twice a day for 14 days after you were in one of the businesses during the dates listed above.
 - Symptoms, which can start up to 14 days after exposure, can include fever or chills, cough, shortness of breath or difficulty breathing, chest pressure or tightness, fatigue, muscle or body aches, headache, loss of taste or smell, sore throat, congestion or runny nose, nausea or vomiting, and diarrhea.
- If you develop any of these symptoms, stay home, except to get tested as soon as possible. Information on testing in Anchorage and the rest of Alaska is available [here](#).
 - You may be infectious to others for two days BEFORE and 10 days AFTER you get sick. Do not go to work or public places. You can easily spread COVID-19 before you feel any symptoms.
 - For more detailed instructions, see CDC's [What To Do if You Are Sick](#)

AHD does not list informal gatherings. Some people confirmed to have COVID-19 did not share or remember all of their close contacts or public places they visited. Additionally, it typically takes 2-7 days before our team is able to learn where potential exposures have occurred.

Community members can help our public health nursing team by keeping a contact log, noting the days and times of the places visited and the people they came in contact with. The contact log helps with contact tracing in the event you become sick with COVID-19.

For more information, call 2-1-1 or visit www.muni.org/COVID-19

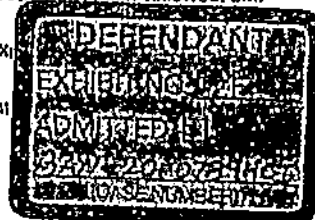
Locations in which no further cases have been identified within the last 10 days are removed from the list.

AHD PROCESS FOR PUBLIC NOTIFICATION OF COVID-19 EXPOSURE LOCATIONS

Anyone in close contact with someone who has COVID-19 is at increased risk of becoming infected and infecting others. Contact tracing helps prevent further transmission by quickly identifying and informing people who may be infected so they can take steps to not infect others.

An exposure location rises to the level of a public notification when a person with COVID-19 spends more than 15 minutes, while infectious in an indoor space, in which:

- More than 10 people other than household members were present;
 - Physical distancing and wearing of face coverings were not or could not be universally followed, and
 - All people at the location cannot be identified or contacted because:
 - the location did not maintain a log of everyone present during the exposure
 - the location log is illegible or incomplete
 - the person with COVID-19 is unable or unwilling to identify close contacts
- Or -

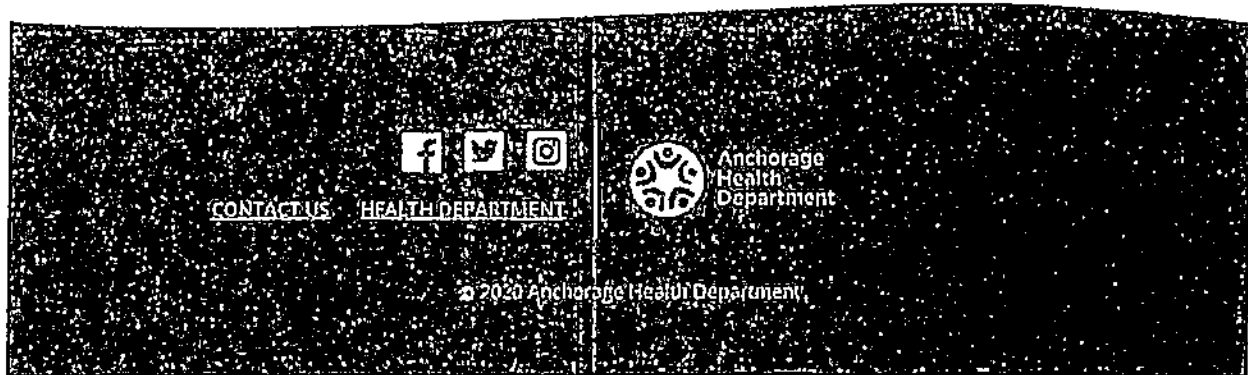


- If AHD lacks capacity to conduct the contact tracing in a timely manner.

When an exposure location of concern is identified, AHD:

- Calls the location and notifies them of the date(s) the exposure occurred.
- Informs the location that they will receive a letter with CDC sanitization instructions and an "exposure notice" sign. The sign must be displayed in a visible area.
- Asks the location if a log of the names and phone numbers of everyone present during the exposure period, per the Municipality's Phase 3 reopening guidelines, was maintained. If a log was maintained, AHD requests a copy to assist with contact tracing.
 - If a complete and legible log was maintained that does not exceed contact tracing capacity, a public exposure notification may not be required.
- Informs the location whether a public exposure notification will be posted to reach all exposed customers at risk of infection.

AHD lists locations where it is unable to contact all persons who likely came into close contact with an infectious person, or if AHD lacks capacity to conduct the contact tracing in a timely manner. COVID-19 exposures can happen even when a location follows all recommended guidelines.



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—
No current locations.

—
IF YOU WERE IN A LOCATION ON A DATE LISTED:

- Stay away from people who are at higher risk for getting very sick from COVID-19.
- Watch for symptoms and check your temperature twice a day for 14 days after you were in one of the businesses during the dates listed above.
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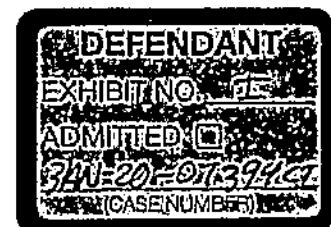
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- If AHD lacks capacity to conduct the contact tracing in a timely manner.

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

MUNICIPALITY OF ANCHORAGE,

Plaintiff,

v.

KRINER'S DINER LLC et al.,

Defendant.

8/9/2020
[Signature]

TREAT AS ORIGINAL

Case No. 3AN-20-07394CI

AFFIDAVIT OF ANDREW KRINER

STATE OF ALASKA)
) ss.
THIRD JUDICIAL DISTRICT)

I, Andrew Kriner, being first duly sworn, depose and state:

1. I am one of three defendants in this above-captioned case. I have personal knowledge of the facts contained herein. If called upon to testify, I would do so according to the facts of this affidavit.

2. Immediately following the hearing in the above-captioned matter on August 7, 2020 my attorney advised me and my wife that he had an ethical obligation to instruct me to follow the order of the court.

3. My attorney later received an anonymous phone call from an employee from Municipal Light and Power who explained that a municipal attorney had instructed Municipal Light and Power to "turn the power off to Kriner's Diner." My attorney spoke with Linda Johnson later that afternoon, and she neither confirmed nor denied the information provided by the anonymous Municipal Light and Power informant.

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4. My attorney called me on August 7, 2020 prior to 3:14 pm. I explained to my attorney that on August 7, 2020, at about 3:00 pm, I had closed Kriner's Diner for the day. My attorney had conveyed that information to Linda Johnson at about 3:14 PM, shortly after his phone call with me. I do not recall confirming with my attorney whether I was going to open for business the next day at that time, but we spoke later that evening and I confirmed that we would open for sure that evening.

5. My attorney informed me that if I was going to open on Saturday morning, he would be there in case the police arrested me and also to advise me if any legal issues were to come up.

FURTHER YOUR AFFIANT SAYETH NAUGHT.


DATED this 9 day of August 2020 at Anchorage, Alaska.



ANDREW KRINER

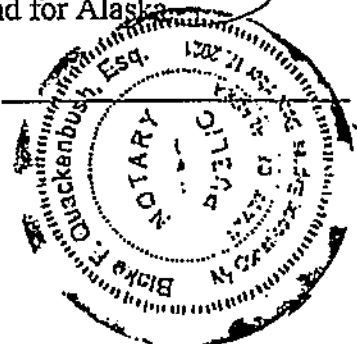
SUBSCRIBED AND SWORN to before me by 9th day of August

2020 at Anchorage, Alaska.



NOTARY PUBLIC in and for Alaska


My commission expires:



CERTIFICATE OF SERVICE

Undersigned hereby certifies that on Aug 9, 2020 a true and correct copy of this document was served by: USPS 1st Class Mail; E-Mail; Fax; Messenger; and/or Hand Delivery to the following recipient(s):

Attn: Ruth Botstein
Attn: Linda Johnson
Municipal Attorney's Office
PO Box 196650
Anchorage AK 99519
Ruth.botstein@anchorageak.gov
Linda.johnson@anchorageak.gov

By: 
BLAKE F. QUACKENBUSH, ESQ.
ALASKA BAR NO. 1405040

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IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
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Plaintiff,

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Defendant.

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TREAT AS ORIGINAL

Case No. 3AN-20-07394CI

AFFIDAVIT OF BLAKE F. QUACKENBUSH, ESQ.

STATE OF ALASKA)
) ss.
THIRD JUDICIAL DISTRICT)

I, Blake F. Quackenbush, Esq., being first duly sworn, depose and state:

1. I am the attorney of record in the above-captioned case, for Defendants Andrew Kriner, Norann Kriner, and Kriner's Diner, LLC., in the above captioned case. I have personal knowledge of the facts contained herein. If called upon to testify, I would do so according to the facts of this affidavit.

2. Immediately following the hearing in the above-captioned matter on August 7, 2020 (in the presence of two legal assistants, three attorneys, an office manager, and an accountant) I advised the Kriners that I had an ethical obligation to instruct them to follow both the August 7, 2020 oral decision on the record and the written *Order Granting Plaintiff's Motion for Temporary Injunction* the order of the court when it got signed by the judge.

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3. Later that afternoon, August 7, 2020, I received an anonymous phone call from an employee from Municipal Light and Power who explained that a municipal attorney had instructed Municipal Light and Power to “turn the power off to Kriner’s Diner.” I spoke with Linda Johnson later that afternoon, and she neither confirmed nor denied the information provided by the anonymous Municipal Light and Power informant.

4. I called Linda Johnson on my cell phone on August 7, 2020 at 3:14 pm after speaking with Andrew Kriner. During that conversation with Linda Johnson, I explained that Andrew Kriner had confirmed he had closed his business at approximately 3:00 pm. My exact statement to Linda Johnson was: “All I asked [Andrew Kriner] was, ‘You need to be closed, are you closed?’ he said, ‘I’m closed.’” At the time of my phone call with Linda Johnson, I had not received clear confirmation from Kriners about whether they intended to open the following morning. I also informed Linda Johnson that I deeply respect the judges who decide these cases and I informed her that I had strongly advised my clients to follow all court orders.

5. My records show that it was not until later that evening on August 7, 2020 that I received clear confirmation that Kriner’s Diner intended to open on Saturday, August 8, 2020 at 9:00 AM. I informed my client that if he was going to open on Saturday morning, that I would be there in case the police arrested him or if he needed legal advice.

6. I am frankly shocked to personally come under attack by Linda Johnson, the attorney for the Municipality of Anchorage, given my assumption that she understands both the United States Constitution and the Constitution of the State of Alaska. I have no personal ill-will towards her or the municipality in which I live. However, I feel the need

to explain my decision to exercise my constitutional rights to clarify the gross misrepresentations set forth in the *Motion for Order to Show Cause* that was signed by Linda Johnson and filed with this court.

7. I went to Kriner's Diner on Saturday, August 8, 2020, and there was already a line beginning to form outside the building; even a news anchor with Channel 2 had arrived on site. Upon entering the restaurant, I was frankly overcome by emotion to see so many people adamantly supporting this small business and its owners. I took a video of the interior of the restaurant and posted it to a private Facebook group called "Save Anchorage" shortly afterwards. Many people expressed their desire to "sit-in" and demonstrate their protest to the Emergency Order 15, and I showed their support to the private group on Facebook. I labeled my post "Americans peacefully protesting in a historic 'sit-in'! Breakfast is served" because that is what I witnessed at Kriner's Diner that morning.

8. Later that morning, August 8, 2020, I posted in a private Facebook group the following:

We have a right to work and support our families and communities. Please, if you are healthy, get out and go to businesses and encourage businesses to have the courage to work. It's crazy to think that we are fighting for a right to work and support our families!

9. Even though my personal beliefs should not be the subject of litigation in this case, I feel compelled to explain that I wrote the foregoing Facebook posts because I strongly believe that a ruined economy will cause greater harm to human lives than COVID-19.

10. I also wrote the statement in paragraph 8 above to a private Facebook group because I am American, and I have a constitutional right to freely speak, write, and publish on all subjects, and my post in a private Facebook group is not an abuse of that right. As an American, I also have the right to freely and peacefully assemble with others.

11. I believe Alaskans have a right to work and support their families and communities.

12. I believe that healthy people should get out of the house and go to businesses—all businesses and not just restaurants—and encourage all businesses to have the courage to work and pay good wages for hard work.

13. I maintain that it is frankly crazy to have to fight for a right to work and support our families. What ever happened to the days when we were so fortunate that we could complain about work on Mondays?

14. Linda Johnson accuses me of committing the crime of “adding and abetting” and also violating the Rules of Professional Conduct, which govern the conduct of attorneys in Alaska. My right to exercise the constitutionally protected right of free speech and assembly is not a crime, and Linda Johnson and the Municipality of Anchorage, frankly, know better. I believe the two should spend their time building a healthy economy instead of wasting time abusing small businesses. Clearly, not all individuals working for the municipality want to harass small businesses, so my thanks go to those helpful individuals.

15. To my knowledge, neither Linda Johnson nor the Municipality of Anchorage have produced any evidence that shows the Kriners indoor dining has in anyway increased the spread of COVID-19 prior to the filing of the complaint in this case.

16. I have not violated this court's order, and I have not violated a Rule of Professional Conduct. I have never at any time advised my client to violate any law or court order. While I strongly maintain that I have constitutional rights to freely assemble and freely speak and publish the information set forth above in a private Facebook group, I am also aware that the following is true under Rule 8.4 of the Rules of Professional Conduct: "A lawyer may refuse to comply with an obligation imposed by law upon a good faith belief that no valid obligation exists."


17. This court's August 7, 2020 *Order Granting Plaintiff's Motion for Temporary Injunction* in no way prohibits me from assembling at Kriner's Diner and it in no way restricts my free speech and constitutional rights.

18. I am not charging the Kriners for my legal services, and the unsolicited money dropped off at our office in support of their case from generous donors has been handed over to the Kriners. That said, my usual hourly rate is \$295 per hour, and I have expended approximately 4.2 hours preparing the documents associated with the opposition to the motion for expedited consideration and motion for an order to show cause and the request for sanctions.

19. My clients, the Kriners, have given me permission to file this affidavit.

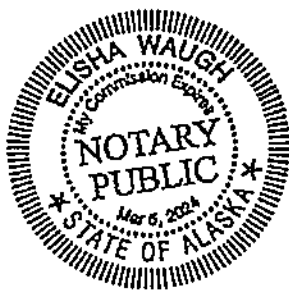
FURTHER YOUR AFFLIANT SAYETH NAUGHT.

DATED this 9th day of August 2020 at Anchorage, Alaska.


BLAKE F. QUACKENBUSH, ESQ.
ALASKA BAR NO. 1405040

SUBSCRIBED AND SWORN to before me by 9th day of Aug

2020 at Anchorage, Alaska.




NOTARY PUBLIC in and for Alaska.

My commission expires: Mar 5, 2024

LAW OFFICES OF BLAKE FULTON QUACKENBUSH

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Phone (907) 868-2780 | Fax (907) 885-0059
blake@BFQLaw.com

CERTIFICATE OF SERVICE

Undersigned hereby certifies that on Aug 7, 2020 a true and correct copy of this document was served by:
USPS 1st Class Mail; E-Mail; Fax; Messenger; and/or LHand Delivery to the following recipient(s):

Attn: Ruth Botstein
Attn: Linda Johnson
Municipal Attorney's Office
PO Box 196650
Anchorage AK 99519
Ruth.botstein@anchorageak.gov
Linda.johnson@anchorageak.gov

By: 
BLAKE F. QUACKENBUSH, ESQ.
ALASKA BAR NO. 1405040

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

MUNICIPALITY OF ANCHORAGE,

Plaintiff,

v.

KRINER'S DINER, LLC, et al.,

Defendants.

TREAT AS ORIGINAL

Case No. 3AN-20-07394 CI

(1) ORDER DENYING MOTION FOR ORDER TO SHOW CAUSE; (2) ORDER DENYING PLAINTIFF'S MOTION FOR SANCTIONS; & (3) GRANTING DEFENDANT'S MOTION FOR RULE 11 SANCTIONS

The Court, having reviewed the pleadings, exhibits, and otherwise being informed in the matter, orders:

- (1) Plaintiff's motion for an order to show cause, hereby orders that the motion is DENIED.
- (2) Plaintiff's motion sanctions against Blake F. Quackenbush, Esq. is DENIED.
- (3) Defendant's motion for Rule 11 sanctions against Linda Johnson is GRANTED. Linda Johnson shall pay _____ to the Kriners through the Kriner's attorney within ten 10 days from the date of the entry of this order.


IT IS SO ORDERED this _____ day of _____ 2020 at Anchorage, Alaska.

ERICA A. AARSETH
SUPERIOR COURT JUDGE

CERTIFICATE OF SERVICE

Undersigned hereby certifies that on May 9, 2020
a true and correct copy of this document was served by:
USPS 1st Class Mail; E-Mail; Fax; Messenger;
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