

FILED
STATE OF ALASKA
Third Judicial District

2020 NOV 24 AM 11:47

CLERK OF THE TRIAL COURTS

BY _____
CLERK

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA

THIRD JUDICIAL DISTRICT AT ANCHORAGE

STATE OF ALASKA,

Plaintiff/Counterclaim Defendant,

vs.

ALASKA STATE EMPLOYEES
ASSOCIATION/AMERICAN
FEDERATION OF STATE, COUNTY
AND MUNICIPAL EMPLOYEES
LOCAL 52, AFL-CIO;

Defendant/Counterclaimant.

ALASKA STATE EMPLOYEES
ASSOCIATION/AMERICAN
FEDERATION OF STATE, COUNTY
AND MUNICIPAL EMPLOYEES
LOCAL 52, AFL-CIO;

Third-Party Plaintiff,

vs.

MICHAEL J. DUNLEAVY, in his
official capacity as Governor of Alaska;
CLYDE "ED" SNIFFEN, in his official
capacity as Acting Attorney General of
Alaska; KELLY TSHIBAKA, in her
official capacity as Commissioner of
the Alaska Department of
Administration; and STATE OF
ALASKA, DEPARTMENT OF
ADMINISTRATION,

Third-Party Defendants.

Case No. 3AN-19-09971 CI

ASEA'S UNOPPOSED MOTION FOR OVER-LENGTH BRIEF

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State of Alaska v. ASEA/AFSCME Local 52, AFL-CIO

Case No. 3AN-19-09971 CI

Page 1 of 3

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1 Alaska State Employees Association / AFSCME Local 52 ("ASEA") moves this
2 Court for an exception to the page limit for ASEA's opposition to the State and third-party
3 defendants' (collectively, the "State's") motion for summary judgment and memorandum
4 in support. Under Administrative Order 3AO-030-04, the opposition is limited to 20 pages.
5 ASEA requests leave to file the accompanying brief of 36 pages. The State and third-party
6 defendants do not oppose ASEA's request.

7 The State's motion for summary judgement to which ASEA is responding is 69
8 pages. The State's motion seeks summary judgement on five separate claims for
9 declaratory relief and against each of ASEA's five counterclaims. The parties submitted
10 over-length briefs in support of their respective cross-motions for summary judgement, and
11 the Court accepted ASEA's over-length brief. An over-length brief (which ASEA is filing
12 concurrently with this request) is similarly necessary here to respond to each of the State's
13 arguments and legal authorities.

14 ASEA respectfully requests that the Court grant this unopposed motion.

15 DATED this 24th day of November 2020.

16 DILLON & FINDLEY, P.C.
Attorneys Alaska State Employees
Association / AFSCME Local 52, AFL-CIO

17 By: Molly C. Brown
18 Molly C. Brown, ABA No. 0506057

19 ALTSHULER BERZON, LLP
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20 Association / AFSCME Local 52, AFL-CIO

21 Scott A. Kronland (*Pro Hac Vice*)
Matthew J. Murray (*Pro Hac Vice*)
22 Stefanie Wilson (*Pro Hac Vice*)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 24th day of November 2020, a true and correct copy of the foregoing document was served by:

☐ hand delivery
☐ first class mail
☒ email

on the following attorneys of record:

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