

**IN THE SUPERIOR COURT FOR THE STATE OF ALASKA**  
**FOURTH JUDICIAL DISTRICT AT FAIRBANKS**

STANLEY ALLEN VEZEY ,                    )  
   )  
   ) Plaintiff,  
   ) vs.  
   ) )  
 BRYCE EDGMON, Speaker of the        )  
 Alaska State House of Representatives, )  
 and CATHERINE A. GIESSEL,            )  
 President of the Alaska State Senate, )  
 individually,                                )  
   )  
   ) Defendants.  
   )

FILED in the Trial Courts  
 State of Alaska Fourth District

**JUL 16 2019**

By \_\_\_\_\_ Deputy

CASE NO. 4FA-19-02233CI

**AFFIDAVIT OF JOANNE SIPES IN SUPPORT OF PLAINTIFF'S**  
**SECOND MOTION FOR EXPEDITED CONSIDERATION**

STATE OF ALASKA                        )  
   ) ss.  
 FOURTH JUDICIAL DISTRICT )

I, Joanne Sipes, being duly sworn upon oath depose and state as follows:

1. That, I am a resident of the Fourth Judicial District, over 21 years of age;
2. That, I am employed as a paralegal by The Law Offices of William R. Satterberg, Jr. I have personal knowledge of the facts contained within this affidavit and am competent to testify thereto;

LAW OFFICES  
**WILLIAM R. SATTERBERG, JR.**  
 ATTORNEY AT LAW  
 709 FOURTH AVENUE  
 FAIRBANKS, ALASKA 99701  
 (907) 452-4454  
 FAX (907) 452-3988  
 office@satterberg.net

3. That, I served copies of Plaintiff's Second Motion for Expedited Consideration of Plaintiff's Motion for Declaratory Judgment and Preliminary Injunction, Affidavit of William R. Satterberg, Jr. in Support of Plaintiff's Second Motion for Expedited Consideration, Affidavit of Joanne Sipes, proposed Order Granting Expedited Consideration, the underlying Motion for Declaratory Judgment and Preliminary Injunction and Hearing Request, Memorandum in Support of Motion for Declaratory Judgment and Preliminary Injunction and Hearing Request, proposed Order, and the attorney's request for a hearing and on Defendant Giessel via first-class mail and via her email, Senator.Cathy.Giessel@akleg.gov on Tuesday, July 16, 2019.

4. That, I served copies of Plaintiff's Second Motion for Expedited Consideration of Plaintiff's Motion for Declaratory Judgment and Preliminary Injunction, Affidavit of William R. Satterberg, Jr. in Support of Plaintiff's Second Motion for Expedited Consideration, Affidavit of Joanne Sipes, proposed Order Granting Expedited Consideration, the underlying Motion for Declaratory Judgment and Preliminary Injunction and Hearing Request, Memorandum in Support of Motion for Declaratory Judgment and Preliminary Injunction and Hearing Request, proposed Order, and the attorney's request for a hearing and on Defendant Edgmon via first class mail and via his email, Rep.Bryce.Edgmon@akleg.gov, and also via facsimile to his legislative office in Juneau, Alaska, at 907-465-4589 on Tuesday, July 16, 2019. On July 16, 2019, I

LAW OFFICES

WILLIAM R. SATTERBERG, JR.

ATTORNEY AT LAW

709 FOURTH AVENUE

FAIRBANKS, ALASKA 99701

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office@satterberg.net

also arranged for the Juneau process server, Civil Claim Service, Jack Dayton, to personally serve the expedited Motion and the underlying Motion on the defendants in Juneau.

5. That, I served copies of Plaintiff's Second Motion for Expedited Consideration of Plaintiff's Motion for Declaratory Judgment and Preliminary Injunction, Affidavit of William R. Satterberg, Jr. in Support of Plaintiff's Second Motion for Expedited Consideration, Affidavit of Joanne Sipes, proposed Order Granting Expedited Consideration, the underlying Motion for Declaratory Judgment and Preliminary Injunction and Hearing Request, Memorandum in Support of Motion for Declaratory Judgment and Preliminary Injunction and Hearing on attorney Kevin Cuddy via email at kevin.cuddy@stoel.com on July 16, 2019.

6. That, on July 11, 2019, I called Defendant Giessel's legislative office in Juneau and left a message inquiring of her fax number for service of the first expedited Motion and requesting to be called back with the contact information or to be advised of Defendant Giessel's legal counsel in the above-captioned matter, if any. No response to my voice message has yet been received.

7. That, both of the defendants were personally served with the Summons and Complaint on Thursday, July 11, 2019. Copies of the Return of Service on both defendants are attached as Appendix 1.

LAW OFFICES

WILLIAM R. SATTERBERG, JR.

ATTORNEY AT LAW

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FAIRBANKS, ALASKA 99701

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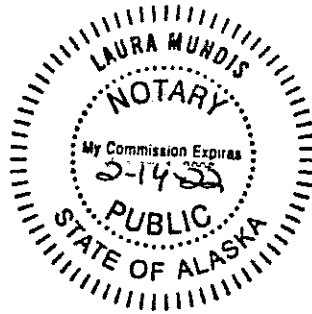
8. That, I served by email to the defendants, and also by fax to Defendant Edgmon, a letter from Plaintiff's counsel requesting the parties to confer concerning Plaintiff's second expedited Motion. A copy of the written communication is attached as Appendix 2 and Appendix 3.


FURTHER YOUR AFFIANT SAYETH NAUGHT.

DATED this 16<sup>th</sup> day of July, 2019, at Fairbanks, Alaska.

  
\_\_\_\_\_  
JOANNE SIPES

SUBSCRIBED AND SWORN TO before me this 16 day of July,  
2019.



  
\_\_\_\_\_  
Notary Public in and for Alaska  
My Commission Expires 2-14-22

jjs

IN THE DISTRICT/SUPERIOR COURT FOR THE STATE OF ALASKA  
FOURTH JUDICIAL DISTRICT AT FAIRBANKS

STANLEY ALLEN VEZEY,

Plaintiff,

VS.

BRYCE EDGMON, Speaker, and CATHERINE A.  
GIESSEL, Individually,

Defendant (s).

CASE NO. 4FA-19-02233CI

RETURN OF SERVICE

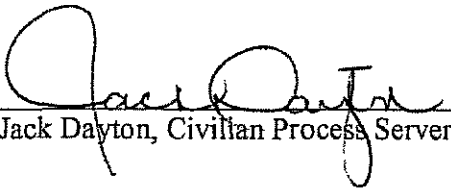
I hereby certify and return that I served the annexed, **Summons, Complaint, and Entry of Appearance**, on the therein named **Catherine A. Giessel**, by handing to and leaving a true and correct copy thereof with **Catherine A. Giessel**, personally at, **State Capital Building, 4<sup>th</sup> and Main Street, 2<sup>nd</sup> Floor**, at Juneau, Alaska in the said District at **9:20 am** on the **11<sup>th</sup> day of July 2019**.

Service fee: \$45.00 Per Rule 11 (A1) (ii)

Mileage fee: \$20.00 Per Rule 11 (A7)

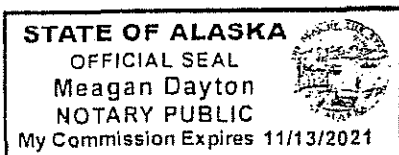
**Total: \$65.00**

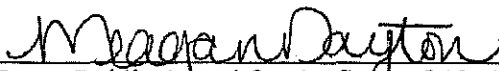
CIVIL CLAIMS SERVICE  
P.O. Box 33898  
JUNEAU, ALASKA 99803  
(907) 364-2714

By:   
Jack Dayton, Civilian Process Server

**Return Date: 7/12/19**

Subscribed and sworn to before me this 12<sup>th</sup> day of July 2019.



  
Notary Public In and for the State of Alaska  
My Commission Expires: 11-13-2021

IN THE DISTRICT/SUPERIOR COURT FOR THE STATE OF ALASKA  
AT FAIRBANKS

STANLEY ALLEN VEZEY,

Plaintiff(s),

vs.

BRYCE EDGMON, Speaker, and CATHERINE A.  
GIESSEL, individually,

CASE NO. 4FA-19-02233 CI

Defendant(s).

SUMMONS  
AND  
NOTICE TO BOTH PARTIES  
OF JUDICIAL ASSIGNMENT

To Defendant: Catherine A. Giesel

You are hereby summoned and required to file with the court a written answer to the complaint which accompanies this summons. Your answer must be filed with the court at 101 Lacey Street, Fairbanks, AK 99701 within 20 days\* after the day you receive this summons. In addition, a copy of your answer must be sent to plaintiff's attorney or plaintiff (if unrepresented) Law Offices of Wm R. Satterberg, Jr., whose address is: 709 Fourth Avenue, Fairbanks, Alaska 99701

If you fail to file your answer within the required time, a default judgment may be entered against you for the relief demanded in the complaint:

If you are not represented by an attorney, you must inform the court and all other parties in this case, in writing, of your current mailing address and any future changes to your mailing address and telephone number. You may use court form *Notice of Change of Address / Telephone Number* (TF-955), available at the clerk's office or on the court system's website at [www.state.ak.us/courts/forms.htm](http://www.state.ak.us/courts/forms.htm), to inform the court. - OR - If you have an attorney, the attorney must comply with Alaska R. Civ. P. 5(i).

NOTICE OF JUDICIAL ASSIGNMENT

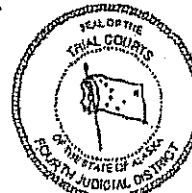
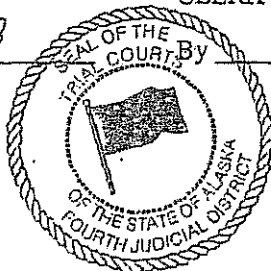
TO: Plaintiff and Defendant

You are hereby given notice that this case has been assigned to Judge Mac Donald

CLERK OF COURT

July 10, 2019  
Date

[Signature]  
Deputy Clerk



\*The State or a state officer or agency named as a defendant has 40 days to file its answer. If you have been served with this summons outside the United States, you also have 40 days to file your answer.

IN THE DISTRICT/SUPERIOR COURT FOR THE STATE OF ALASKA  
FOURTH JUDICIAL DISTRICT AT FAIRBANKS

STANLEY ALLEN VEZEY,

Plaintiff,

VS.

BRYCE EDGMON, Speaker, and CATHERINE A.  
GIESSEL, Individually,

Defendant (s).

CASE NO. 4FA-19-02233CI

RETURN OF SERVICE

I hereby certify and return that I served the annexed, **Summons, Complaint, and Entry of Appearance**, on the therein named **Bryce Edgmon, Speaker**, by handing to and leaving a true and correct copy thereof with **Bryce Edgmon**, personally at, **State Capital Building, 4<sup>th</sup> and Main Street, 2<sup>nd</sup> Floor**, at Juneau, Alaska in the said District at **9:23 am** on the **11<sup>th</sup>** day of **July 2019**.

Service fee: \$45.00 Per Rule 11 (A1) (ii)

Mileage fee: \$20.00 Per Rule 11 (A7)

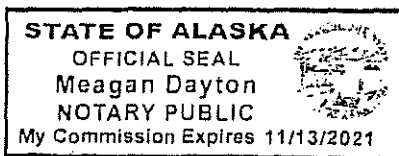
**Total: \$65.00**

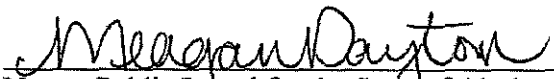
CIVIL CLAIMS SERVICE  
P.O. Box 33898  
JUNEAU, ALASKA 99803  
(907) 364-2714

By:   
Jack Dayton, Civilian Process Server

**Return Date: 7/12/19**

Subscribed and sworn to before me this 12<sup>th</sup> day of July 2019.



  
Notary Public In and for the State of Alaska  
My Commission Expires: 11-13-2021

IN THE DISTRICT/SUPERIOR COURT FOR THE STATE OF ALASKA  
AT FAIRBANKS

STANLEY ALLEN VEZEY,

Plaintiff(s),

vs.

BRYCE EDGMON, Speaker, and CATHERINE A.  
GIESSEL, individually,

CASE NO. 4FA-19-02233 CI

Defendant(s).

SUMMONS  
AND  
NOTICE TO BOTH PARTIES  
OF JUDICIAL ASSIGNMENT

To Defendant: Bryce Edgmon

You are hereby summoned and required to file with the court a written answer to the complaint which accompanies this summons. Your answer must be filed with the court at 101 Lacey Street, Fairbanks, AK 99701 within 20 days\* after the day you receive this summons. In addition, a copy of your answer must be sent to plaintiff's attorney or plaintiff (if unrepresented) Law Offices of Wm R. Satterberg, Jr., whose address is: 709 Fourth Avenue, Fairbanks, Alaska 99701

If you fail to file your answer within the required time, a default judgment may be entered against you for the relief demanded in the complaint.

If you are not represented by an attorney, you must inform the court and all other parties in this case, in writing, of your current mailing address and any future changes to your mailing address and telephone number. You may use court form *Notice of Change of Address / Telephone Number* (TF-955), available at the clerk's office or on the court system's website at [www.state.ak.us/courts/forms.htm](http://www.state.ak.us/courts/forms.htm), to inform the court. - OR - If you have an attorney, the attorney must comply with Alaska R. Civ. P. 5(i).

NOTICE OF JUDICIAL ASSIGNMENT

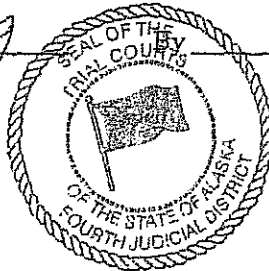
TO: Plaintiff and Defendant

You are hereby given notice that this case has been assigned to Judge MacDonald

CLERK OF COURT

July 10, 2019  
Date

[Signature]  
Deputy Clerk



\*The State or a state officer or agency named as a defendant has 40 days to file its answer. If you have been served with this summons outside the United States, you also have 40 days to file your answer.



[Print](#) | [Close Window](#)

**Subject:** Letter attached re: Vezey vs. Edgmon et al.

**From:** joanne@satterberg.net

**Date:** Mon, Jul 15, 2019 10:38 am

**To:** "Catherine Giessel" <Senator.Cathy.Giessel@akleg.gov>, "Bryce Edgmon" <Rep.Bryce.Edgmon@akleg.gov>

**Cc:** "Bill Satterberg" <bill@satterberg.net>

**Attach:** LetterFromBillSatterberg.pdf

Senator Giessel and Representative Edgmon:

Please find attached a letter from Bill Satterberg.

Thank you

Joanne Sipes  
Legal Assistant  
Law Offices of William R. Satterberg, Jr.  
709 Fourth Avenue  
Fairbanks, Alaska 99701  
907-452-4454 (fax 452-3988)

THE INFORMATION CONTAINED HEREIN IS CONFIDENTIAL AND MAY BE SUBJECT TO ATTORNEY-CLIENT PRIVILEGE. IT IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED ABOVE. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, OR THE EMPLOYEE OR AGENT RESPONSIBLE TO DELIVER IT TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY. THANK YOU.

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*APPENDIX 2*

LAW OFFICES

**WILLIAM R. SATTERBERG, JR.**

FAX (907) 452-3988

ATTORNEY AT LAW  
709 FOURTH AVENUE  
FAIRBANKS, ALASKA 99701  
(907) 452-4454

July 15, 2019

Senator Cathy Giessel  
State Capitol Room 111  
Juneau, Alaska 99801

Rep. Bryce Edgmon  
State Capitol Room 416  
Juneau, Alaska 99801

1500 W. Benson Blvd.  
Anchorage, Alaska 99503  
[Senator.Cathy.Giessel@akleg.gov](mailto:Senator.Cathy.Giessel@akleg.gov)

P.O. Box 886  
Bethel, Alaska 99559  
[Rep.Bryce.Edgmon@akleg.gov](mailto:Rep.Bryce.Edgmon@akleg.gov)

Re: *Vezey v. Edgmon et al.*, Case No. 4FA-19-02233CI

Dear Senator Giessel and Representative Edgmon:

This letter is to initiate a conference among the parties to the above-captioned matter in order to hold a telephonic meeting and to confer on expediting Plaintiff Vezey's Motion for Declaratory Judgment and Preliminary Injunction. On July 12, 2019, the court denied Plaintiff's first Motion for expedited consideration for a failure of the parties' attorneys to confer. Plaintiff will file another Motion for Expedited Consideration, and a copy of the Second Motion for Expedited Consideration of Motion for Declaratory Judgment and Preliminary Injunction will be served on you by email and fax.

Please note that the purpose of Plaintiff's lawsuit is not to take sides on the governor's vetoes, the capital budget, or the Permanent Fund dividend. Rather, the purpose is to have the court order the legislature to assemble in one location in order to work out the issues to be addressed as outlined in the governor's proclamation for a special session. To date, to the undersigned's knowledge, the last seven days have accomplished nothing to resolve the impasse.

Time is of the essence. Your immediate response to this letter is requested. If you are now represented by legal counsel in this matter, might you please forward this communication to your attorney without delay?

Sincerely,

  
William R. Satterberg, Jr.

WRS/js  
Encl.

THE LAW OFFICES OF WILLIAM R. SATTERBERG, JR.

709 Fourth Avenue

Fairbanks, Alaska 99701

Telephone: (907) 452-4454

Telefax: (907) 452-3988

TELEFACSIMILE COVER SHEET

NAME OF RECIPIENT: Rep. Bryce Edgmon

TELEFAX NUMBER: 907-465-4589

LOCATION: Juneau

DATE: July 15, 2019

DOCUMENT TITLE: Letter

CONSISTING OF: 2 pages, including cover sheet.

ORIGINAL TO BE MAILED:  YES  NO

*If you do not receive all of the facsimile pages, please contact this office at the telephone number listed above. If this facsimile has been received in error, please contact this office so that the document may be retrieved at no cost to you.*

COMMENTS: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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LAW OFFICES

**WILLIAM R. SATTERBERG, JR.**

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FAIRBANKS, ALASKA 99701  
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July 15, 2019

Senator Cathy Giessel  
State Capitol Room 111  
Juneau, Alaska 99801

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State Capitol Room 416  
Juneau, Alaska 99801

1500 W. Benson Blvd.  
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[Senator.Cathy.Giessel@akleg.gov](mailto:Senator.Cathy.Giessel@akleg.gov)

P.O. Box 886  
Bethel, Alaska 99559  
[Rep.Bryce.Edgmon@akleg.gov](mailto:Rep.Bryce.Edgmon@akleg.gov)

Re: *Vezey v. Edgmon et al.*, Case No. 4FA-19-02233CI

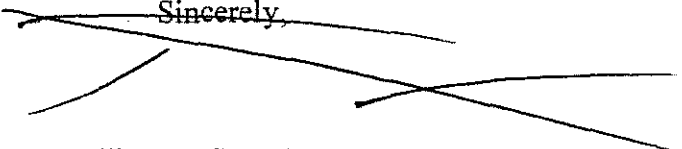
Dear Senator Giessel and Representative Edgmon:

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Please note that the purpose of Plaintiff's lawsuit is not to take sides on the governor's vetoes, the capital budget, or the Permanent Fund dividend. Rather, the purpose is to have the court order the legislature to assemble in one location in order to work out the issues to be addressed as outlined in the governor's proclamation for a special session. To date, to the undersigned's knowledge, the last seven days have accomplished nothing to resolve the impasse.

Time is of the essence. Your immediate response to this letter is requested. If you are now represented by legal counsel in this matter, might you please forward this communication to your attorney without delay?

Sincerely,

  
William R. Satterberg, Jr.

WRS/js  
Encl.

\*\*\*\*\*  
\*\*\* FAX TX REPORT \*\*\*  
\*\*\*\*\*

TRANSMISSION OK

JOB NO.	0373
DEPT. ID	1234
DESTINATION ADDRESS	19074654589
SUBADDRESS	
DESTINATION ID	
ST. TIME	07/15 10:36
TX/RX TIME	01' 09
PGS.	2
RESULT	OK

THE LAW OFFICES OF WILLIAM R. SATTERBERG, JR.  
 709 Fourth Avenue  
 Fairbanks, Alaska 99701  
 Telephone: (907) 452-4454  
 Telefax: (907) 452-3988

TELEFACSIMILE COVER SHEET

NAME OF RECIPIENT: Rep. Bryce Edgmon

TELEFAX NUMBER: 907-465-4589

LOCATION: Juneau

DATE: July 15, 2019

DOCUMENT TITLE: Letter

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COMMENTS: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA  
FOURTH JUDICIAL DISTRICT AT FAIRBANKS

STANLEY ALLEN VEZEY , )  
)  
Plaintiff, )  
vs. )  
)  
BRYCE EDGMON, Speaker of the )  
Alaska State House of Representatives, )  
and CATHERINE A. GIESSEL, )  
President of the Alaska State Senate, )  
individually, )  
)  
Defendants. )  
)

CASE NO. 4FA-19-02233CI

**ORDER GRANTING EXPEDITED CONSIDERATION**

IT IS HEREBY ORDERED that Plaintiff's Second Motion for Expedited Consideration of Plaintiff's Motion for Declaratory Judgment be and is hereby GRANTED.

DATED: \_\_\_\_\_

\_\_\_\_\_  
Superior Court Judge

:js

LODGED

JUL 16 2019

LAW OFFICES  
WILLIAM R. SATTERBERG, JR.  
ATTORNEY AT LAW  
709 FOURTH AVENUE  
FAIRBANKS, ALASKA 99701  
(907) 452-4454  
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