

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF DAKOTA

FIRST JUDICIAL DISTRICT

CASE TYPE: Civil Other/Misc.

Tyler Kistner, Tomas Settell, Leilani Holmstadt, Jose W. Jimenez, Fern A. Smith, Mariah de la Paz, Cynthia Lonquist, Pam Myhra, Megan Olson, Sandra A. Jimenez, Deborah Coxe, and Greg Buck, Jerry Ewing,

Court File No. 19AV-CV-20-2183

Contestants,

v.

Steve Simon, only in his official capacity as the Minnesota Secretary of State, Andy Lokken, only in his official capacity as the Elections Director for Dakota County, Angie Craig, Matt Klein, Karla Bigham, Greg Clausen, Liz Reyer, Rick Hansen, Ruth Richardson, Jessica Hanson, Robert Bierman, and John D. Huot,

Contestees.

**CONTESTEES MATT KLEIN, KARLA BIGHAM, GREG CLAUSEN, LIZ REYER, RICK HANSEN, RUTH RICHARDSON, JESSICA HANSON, ROBERT BIERMAN, AND JOHN HUOT'S NOTICE OF MOTION AND MOTION TO DISMISS**

TO: Contestants Tyler Kistner, Tomas Settell, Leilani Holmstadt, Jose W. Jimenez, Fern A. Smith, Mariah de la Paz, Cynthia Lonquist, Pam Myhra, Megan Olson, Sandra A. Jimenez, Deborah Coxe, and Greg Buck, Jerry Ewing and their counsel Jane L. Volz, Volz Law Firm, Ltd., 21510 Palomino Drive, Prior Lake, MN 55372

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that on a date and time determined by the Court, Contestees Matt Klein, Karla Bigham, Greg Clausen, Liz Reyer, Rick Hansen, Ruth Richardson, Jessica Hanson, Robert Bierman, and John D. Huot will move the Court for entry of an order as set forth below.

**MOTION**

Pursuant to Minnesota Rule of Civil Procedure 12.02, Contestees Matt Klein, Karla Bigham, Greg Clausen, Liz Reyer, Rick Hansen, Ruth Richardson, Jessica Hanson, Robert Bierman, and John D. Huot respectfully move the Court for an order dismissing the Notice of Contest in its entirety.

The motion is based upon all the files, records, and proceedings herein, and upon a memorandum of law, supporting declaration, and exhibits to be filed in accordance with the Minnesota General Rules of Practice.

Dated: December 8, 2020

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

s/Charles N. Nauen

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