

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

LEAGUE OF UNITED LATIN
AMERICAN CITIZENS OF IOWA ,
Plaintiff,

v.

Iowa Secretary of State PAUL PATE,
in his official capacity, and Iowa
Attorney General THOMAS
MILLER, in his official capacity,
Defendants,

Case No. CVCV061476

Proposed Intervenors'
Responsive Pleading

The Republican National Committee (RNC), the National Republican Senatorial Committee (NRSC), the National Republican Congressional Committee (NRCC), and the Republican Party of Iowa submit this responsive pleading in support of their motion to intervene under Iowa Rule of Civil Procedure 1.407.

STATEMENT OF THE CASE

1. Admit.
2. Admit that election legislation was recently passed by the Iowa General Assembly. Deny the remaining allegations.
3. Deny.

4. To the extent this paragraph makes a factual claim it is denied.
5. To the extent this paragraph makes a factual claim it is denied.
6. To the extent this paragraph makes a factual claim it is denied.
7. To the extent this paragraph makes a factual claim it is denied.
8. To the extent this paragraph makes a factual claim it is denied.
9. Denied.

JURISDICTION AND VENUE

10. Admitted.
11. Admitted.

PARTIES

12. Denied for lack of information.
13. Admitted.
14. Admitted.

FACTUAL ALLEGATIONS

15. The statistical information cited speaks for itself.
16. Admitted.
17. Admitted.

18. The statistical information cited speaks for itself.
19. Denied for lack of information.
20. Admitted.
21. Denied for lack of information.
22. Admitted.
23. Admitted.
24. Denied for lack of information.
25. Admitted.
26. To the extent this paragraph makes a factual claim it is denied.
27. Denied.
28. Denied for lack of information.
29. Denied for lack of information.
30. Denied for lack of information.
31. Denied for lack of information.
32. Denied for lack of information.
33. Denied for lack of information.
34. Denied for lack of information.

35. Denied for lack of information.

36. Deny the legislation is properly named in this paragraph. The legislative record speaks for itself.

37. Admitted.

38. Denied.

39. Deny the legislation is properly named in this paragraph. The provisions of the law speak for themselves.

40. Deny the legislation is properly named in this paragraph. The provisions of the law speak for themselves.

41. Deny the legislation is properly named in this paragraph. The provisions of the law speak for themselves.

42. Deny the legislation is properly named in this paragraph. The provisions of the law speak for themselves.

43. Deny the legislation is properly named in this paragraph. The provisions of the law speak for themselves.

44. Deny the legislation is properly named in this paragraph. The provisions of the law speak for themselves.

45. Admitted.

46. Denied.

47. Admitted.

48. Deny the legislation is properly named in this paragraph. The provisions of the law speak for themselves.

49. Denied.

50. Denied.

51. Denied.

52. Denied.

53. Denied.

54. Deny the legislation is properly named in this paragraph. The provisions of the law speak for themselves.

55. Deny the legislation is properly named in this paragraph. The provisions of the law speak for themselves.

56. Denied.

57. The provisions of the law speak for themselves.

58. Deny the legislation is properly named in this paragraph. The provisions of the law speak for themselves.

59. Deny the legislation is properly named in this paragraph. The provisions of the law speak for themselves.

60. Admitted.

61. Deny the legislation is properly named in this paragraph. The provisions of the law speak for themselves.

62. Denied.

63. Denied.

64. Denied.

65. Denied.

66. Denied.

67. Denied.

68. Denied.

69. Denied.

70. Denied.

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CAUSES OF ACTION

COUNT I

71. The answers provided above are reincorporated.

72. Deny that the paragraph fully and fairly sets forth the legal issues presented by the Petition.

73. Denied.

74. Denied.

75. Denied.

76. Denied.

77. Denied.

78. Denied.

79. Denied.

80. Denied.

81. Denied.

82. Denied.

83. Denied.

84. Denied.

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COUNT II

85. The answers provided above are reincorporated.

86. Deny that the paragraph fully and fairly sets forth the legal issues presented by the Petition.

87. Denied.

88. Denied.

89. Denied.

90. Denied.

COUNT III

91. The answers provided above are reincorporated.

92. Deny that the paragraph fully and fairly sets forth the legal issues presented by the Petition.

93. Denied.

94. Denied.

COUNT IV

95. The answers provided above are reincorporated.

96. Deny that the paragraph fully and fairly sets forth the legal issues presented by the Petition.

97. Denied.

98. Denied.

99. Denied.

100. Denied.

101. Denied.

Respectfully submitted,

/s/ Alan R. Ostergren

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