

Lauren Elliott Stine (AZ# 025083)
Coree E. Neumeyer (AZ# 025787)
QUARLES & BRADY LLP
One Renaissance Square
Two North Central Avenue, Suite 600
Phoenix, AZ 85004-2391
(602) 229-5200
Lauren.Stine@quarles.com
Coree.Neumeyer@quarles.com

Lee H. Rubin (Admitted PHV)
MAYER BROWN LLP
Two Palo Alto Square, Suite 300
3000 El Camino Real
Palo Alto, CA 94306-2112
(650) 331-2000
lrubin@mayerbrown.com

Additional counsel listed on last page

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Mi Familia Vota; Arizona Coalition for
Change; Living United for Change in
Arizona; and League of Conservation
Voters, Inc. d/b/a Chispa AZ,

Plaintiffs,

v.

Adrian Fontes, in his official capacity as
Arizona Secretary of State; et al.,

Defendants,

and

RNC and NRSC,

Defendant-Intervenors.

Courtney Hostetler (Admitted PHV)
John Bonifaz (Admitted PHV)
Ben Clements (Admitted PHV)
FREE SPEECH FOR PEOPLE
48 N. Pleasant St, Suite 304
Amherst, MA 01002
(617) 249-3015
jbonifaz@freespeechforpeople.org
chostetler@freespeechforpeople.org
bclements@freespeechforpeople.org

Case No. CV-21-01423-PHX-DWL

**NOTICE OF CONDITIONAL
SETTLEMENT IN PRINCIPLE**

1 Plaintiffs Mi Familia Vota, Arizona Coalition for Change, Living United for Change
2 in Arizona, and League of Conservation Voters, Inc. d/b/a Chispa AZ (jointly, “Plaintiffs”),
3 Defendant Arizona Attorney General, and nominal Defendant Arizona Secretary of State
4 herein provide an update on the status of negotiations concerning resolution of this litigation
5 short of trial.

6 On June 2, 2025, counsel for Plaintiffs and the Arizona Attorney General and
7 Arizona Secretary of State reached an agreement in principle for resolution of the litigation,
8 conditioned on the approval of Arizona’s Voter Registration Advisory Committee
9 (“VRAC”). The VRAC is composed of the nominal defendant county recorders in this
10 action.

11 Under the terms of the proposed agreement, the VRAC would adopt guidance about
12 best practices for implementation of SB 1485 and Plaintiffs would voluntarily dismiss their
13 suit. Counsel for Defendant Arizona Attorney General and nominal Defendant Arizona
14 Secretary of State sent the proposal to counsel for the county recorders on June 4, 2025, and
15 the VRAC will meet on June 25, 2025, to consider the proposal.

16 Plaintiffs, the Arizona Attorney General, and the Arizona Secretary of State support
17 the proposal, and the Arizona Attorney General and Arizona Secretary of State intend to
18 voice support for the proposal during the June 25 meeting. Intervenor-Defendants
19 Republican National Committee and Republican Senatorial Committee do not object to the
20 proposed settlement agreement between the Plaintiffs and the named Defendants. One or
21 more parties will update the Court after the June 25 meeting.

22
23
24
25
26
27
28

1 Dated: June 23, 2025

Respectfully submitted,

2 /s/ Lee H. Rubin

3 Lee H. Rubin (Admitted PHV)
4 **MAYER BROWN LLP**
5 Two Palo Alto Square, Suite 300
6 3000 El Camino Real
7 Palo Alto, CA 94306-2112
8 (650) 331-2000
9 lrubin@mayerbrown.com

Lauren Elliott Stine (AZ #025083)
Coree E. Neumeyer (AZ# 025787)
QUARLES & BRADY LLP
One Renaissance Square
Two North Central Avenue, Suite 600
Phoenix, AZ 85004-2391
(602) 229-5200
Lauren.Stine@quarles.com
Coree.Neumeyer@quarles.com

8 Daniel T. Fenske (Admitted PHV)
9 **MAYER BROWN LLP**
10 71 S. Wacker Drive
11 Chicago, IL 60606
12 (312) 782-0600
13 dfenske@mayerbrown.com

Courtney Hostetler (Admitted PHV)
John Bonifaz (Admitted PHV)
Ben Clements (Admitted PHV)
FREE SPEECH FOR PEOPLE
48 N. Pleasant St, Suite 304
Amherst, MA 01002
(617) 249-3015
chostetler@freespeechforpeople.org
jbonifaz@freespeechforpeople.org
bclements@freespeechforpeople.org

12 Rachel J. Lamorte (Admitted PHV)
13 **MAYER BROWN LLP**
14 1999 K Street NW
15 Washington, DC 20006
16 (202) 362-3000
17 rlamorte@mayerbrown.com

Attorneys for Plaintiffs

18 /s/ Joshua M. Whitaker
19 Hayleigh S. Crawford
20 Joshua M. Whitaker
21 Kathryn E. Boughton
22 Joshua G. Nomkin
23 Office of the Arizona Attorney General
24 2005 N. Central Ave.
25 Phoenix, Arizona 85004-1592
26 (602) 542-3333

*Attorneys for Defendant Attorney General
Kristin K. Mayes*

25 /s/ Craig A. Morgan
26 Craig A. Morgan
27 Shayna Stuart
28 Sherman & Howard L.L.C.
2555 East Camelback Road, Suite 1050
Phoenix, Arizona 85016

1 *Attorneys for Defendant Arizona Secretary*
2 *of State Adrian Fontes*

3 /s/ Thomas Basile

4 Tyler Green
5 Cameron T. Norris
6 CONSOVOY MCCARTHY PLLC
7 1600 Wilson Blvd., Ste. 700
8 Arlington, VA 22209
9 (703) 243-9423
10 tyler@consovoymccarthy.com
11 cam@consovoymccarthy.com

12 Kory Langhofer
13 Thomas Basile
14 STATECRAFT PLLC
15 649 North Fourth Avenue, First Floor
16 Phoenix, AZ 85003
17 (602) 382-4078
18 kory@statecraftlaw.com
19 tom@statecraftlaw.com

20 *Attorneys for Intervenor-Defendants*
21 *Republican National Committee and*
22 *National Republican Senatorial Committee*
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on June 23, 2025, a copy of the Notice of Conditional Settlement in Principle was filed electronically with the Arizona District Court Clerk's Office using the CM/ECF System for filing, which will provide a Notice of Electronic Filing to all CM/ECF registrants.

/s/ Lee H. Rubin

RETRIEVED FROM DEMOCRACYDOCKET.COM