

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

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LEAGUE OF UNITED LATIN AMERICAN  
CITIZENS OF IOWA,

Case No. CVCV062715

Petitioner,

v.

**NOTICE OF FILING**

IOWA SECRETARY OF STATE PAUL  
PATE, in his official capacity; IOWA  
VOTER REGISTRATION COMMISSION;  
BUENA VISTA COUNTY AUDITOR SUE  
LLOYD, in her official capacity; CALHOUN  
COUNTY AUDITOR ROBIN BATZ, in her  
official capacity; JEFFERSON COUNTY  
AUDITOR SCOTT RENEKER, in his  
official capacity; MONTGOMERY  
COUNTY AUDITOR JILL OZUNA, in her  
official capacity,

Respondents.

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In its June 29 Order, the Court set a separate hearing regarding the nature of appropriate relief in this action. Petitioner hereby states its position on the appropriate relief in this case.

Petitioner's first count seeks a declaratory judgment clarifying the scope of Iowa's English Language Reaffirmation Act. Iowa Code § 1.18. Under the Act, "[a]ll official documents ... shall be in the English language," except as provided for in subsections 5 and 6. Iowa Code § 1.18(3). Specifically, subsection 5 exempts "[a]ny language usage required by or necessary to secure rights guaranteed by the Constitution and laws of the United States of America or the Constitution of the State of Iowa." Iowa Code § 1.18(5)(h) (the "Rights Exception"). For the reasons stated in this Court's June 29 Order granting Petitioner's Motion for Summary Judgment its entirety, Petitioner is entitled to a declaration that voting materials fall within the Rights Exception and are, therefore,

not subject to the requirements of Iowa Code § 1.18. This notice is accompanied by a Proposed Order to that effect as Exhibit A.

As a prevailing party, Petitioner is entitled to taxable costs under Iowa Code § 625.1. These include filing fees and the necessary expenses of taking depositions. *See* Iowa Code § 625.14. Petitioner's total taxable costs are \$4,172.50. This notice is accompanied by documentation of those costs in Exhibit B.

RETRIEVED FROM DEMOCRACYDOCKET.COM

Dated this 17th day of August, 2023.

Respectfully submitted,

/s/ Shayla L. McCormally

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William K. Hancock\*  
Melinda K. Johnson\*  
Alexander F. Atkins\*  
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*Counsel for Petitioner LULAC*

*\*Admitted Pro Hac Vice*

## **Exhibit B**

RETRIEVED FROM DEMOCRACYPOCKET.COM



Shayla McCormally &lt;shayla@mciowalaw.com&gt;

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**Payment Confirmation for Iowa Judicial Branch**

1 message

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**Iowa Judicial Branch** <epaynoreply@usbank.com>  
To: shayla@mciowalaw.com

Wed, Oct 27, 2021 at 1:48 PM

\*\*\* PLEASE DO NOT RESPOND TO THIS EMAIL \*\*\*

Thank you for your payment.

This email is to confirm your payment submitted on Oct-27-2021 for Iowa Judicial Branch.

Confirmation Number: IOWJU3010634250  
Payment Amount: \$195.00  
Scheduled Payment Date: Oct-27-2021  
Amount Due: \$195.00

Payer Name: Shayla McCormally  
Credit Card Number: \*0199  
Credit Card Type: VISA  
Approval Code: 027126

Merchant: Judicial Branch  
Website: <http://www.iowacourtsonline.org/>

If you have questions about this payment or need assistance, please view the payment online at <https://www.iowacourts.state.ia.us/EFile>, or call Customer Service at (515)348-4896.

Thank you for using the State of Iowa Judicial electronic payment system.

U.S. BANCORP made the following annotations

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Electronic Privacy Notice. This e-mail, and any attachments, contains information that is, or may be, covered by electronic communications privacy laws, and is also confidential and proprietary in nature. If you are not the intended recipient, please be advised that you are legally prohibited from retaining, using, copying, distributing, or otherwise disclosing this information in any manner. Instead, please reply to the sender that you have received this communication in error, and then immediately delete it. Thank you in advance for your cooperation.  
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# Invoice

Digital Evidence Group  
1730 M Street NW  
Suite 812  
Washington, DC 20036  
252-292-1376

Date	Invoice #
1/17/2023	23954
Tax ID # 31-1763752	

**Please note our new EIN!**

## Bill To

Elias Law Group  
Michelle DePass

Terms	Due Date
Net 30	2/16/2023

Description	Serviced	Case Caption	Deponent	Amount
Appearance Fee	12/12/2022	LULA v. Pate	Susan Lloyd	100.00
Court Reporting - Remote - 10 Day Turnaround				238.50
Exhibits Processing/Scanned				8.00
Remote Hot Seat Exhibit/Video Capture				600.00
Remote Video Connection				100.00

We accept Credit Card payments and do not charge any processing fees.

**Total** \$1,046.50

If you have any questions or concerns please contact  
Amanda Harrell at Digital Evidence Group at  
252-292-1376.

**Payments/Credits** \$0.00

**Balance Due** \$1,046.50



DIGITAL  
EVIDENCE  
GROUP  
LLC

# Invoice

Bill to: 1002.2111

Digital Evidence Group  
1730 M Street NW  
Suite 812  
Washington, DC 20036  
202-494-0625

Date	Invoice #
1/19/2023	24046
Tax ID # 31-1763752	

Please note our new EIN!

## Bill To

Elias Law Group  
Michelle DePass

Terms	Due Date
Net 30	2/18/2023

Description	Serviced	Case Caption	Deponent	Amount
Appearance Fee	12/19/2022	LULA v. Pate	Molly Widen	100.00
Court Reporting - Remote - 10 Day Turnaround				531.00
Rough Draft				212.40
Exhibits Processing/Scanned				37.00
Remote Hot Seat Exhibit/Video Capture				600.00
Remote Video Connection				100.00

We accept Credit Card payments and do not charge any processing fees.

**Total** \$1,580.40

If you have any questions or concerns please contact Digital Evidence Group at 202-494-0625

**Payments/Credits** \$0.00

**Balance Due** \$1,580.40



# Invoice

Bill to: 1002.2111

Digital Evidence Group  
1730 M Street NW  
Suite 812  
Washington, DC 20036  
202-494-0625

Date	Invoice #
1/18/2023	23785
Tax ID # 31-1763752	

Please note our new EIN!

Bill To
Elias Law Group Michelle DePass

Terms		Due Date		
Net 30		2/17/2023		
Description	Serviced	Case Caption	Deponent	Amount
Appearance Fee	12/20/2022	LULA v. Pate	Monica Stone	100.00
Court Reporting - Remote - 10 Day Turnaround				391.50
Exhibits Processing/Scanned				2.50
Rough Draft				156.60
Remote Hot Seat Exhibit/Video Capture				600.00
Remote Video Connection				100.00
We accept Credit Card payments and do not charge any processing fees.		<b>Total</b> \$1,350.60		
If you have any questions or concerns please contact Digital Evidence Group at 202-494-0625		<b>Payments/Credits</b> \$0.00		
		<b>Balance Due</b> \$1,350.60		