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12 *to be admitted pro hac vice

13 *Attorneys for Contestant-Plaintiff*

14 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
15 **IN AND FOR THE COUNTY OF MARICOPA**

16 Kari Lake,
17 Contestant/Plaintiff,

18 **Case No. CV2022-095403**
19 **(Honorable Peter Thompson)**

20 v.

21 Katie Hobbs, personally as Contestee and
22 in her official capacity as Secretary of
23 State; Stephen Richer in his official
24 capacity as Maricopa County Recorder;
25 Bill Gates, Clint Hickman, Jack Sellers,
26 Thomas Galvin, and Steve Gallardo, in
27 their official capacities as members of the
28 Maricopa County Board of Supervisors;
29 Scott Jarrett, in his official capacity as
30 Maricopa County Director of Elections;
31 and the Maricopa County Board of
32 Supervisors,

33 **VERIFIED AMENDED PETITION TO**
34 **INSPECT BALLOTS PURSUANT TO**
35 **A.R.S. § 16-677**

36 **Defendants/Contestees.**

37 Pursuant to A.R.S. § 16-677, Plaintiff hereby petitions this Honorable Court to
38 allow an inspection of the ballots used in the 2022 general election held in Maricopa
39 County. Plaintiff cannot properly prepare for trial without such an inspection.

1 Specifically, Maricopa County used ballots printed either by Runbeck Election
2 Services (“Runbeck”) or ballots printed using ballot-on-demand (BOD) printers
3 deployed at vote centers. As pled in the Plaintiff’s Complaint in Special Action and
4 Verified Statement of Election Contest Pursuant to A.R.S. § 16-672 (the “Election
5 Contest”), on November 8, 2022 (“Election Day”), 132 out of the total 223 Maricopa
6 County vote centers (59.2%), experienced widespread tabulator rejections of ballots
7 printed by BOD printers. Election Contest at ¶ 68. These widespread breakdowns and
8 rejected ballots, and the causes of those events, are material issues in this case. Maricopa
9 County also attributed these failures to various issues with the BOD Printers thereby
10 further placing these failures at issue in this case.¹

11
12 In order to properly prepare this case for trial, Plaintiff respectfully requests to
13 inspect ballots printed by Runbeck, ballots printed by BOD printers, and spoiled BOD
14 printed ballots. Plaintiff also requests the Court order Maricopa County to maintain the
15 BOD ballots segregated by vote center as Plaintiff believes they are currently stored.
16 Plaintiff requests that her designated representative be allowed to: (i) randomly select 50
17 BOD printed ballots cast on Election Day from six vote centers chosen by Plaintiff’s
18 representative; (ii) randomly select 50 early voting ballots from six separate batches
19 chosen by Plaintiff’s representative; (iii) randomly select 50 ballot envelopes for early
20 ballots cast in the 2022 general election; and (iv) randomly select 50 early vote ballots
21 that were marked as spoiled on Election Day from six separate batches chosen by
22 Plaintiff’s representative.

23 RESPECTFULLY SUBMITTED this 14th day of December 2022.

24
25
26 /s/Bryan James Blehm
Bryan James Blehm

27
28 ¹ See Declaration of Clay Parikh, Plaintiff’s cyber expert (“Parikh Decl.”) attached as Ex.
13 to the Olsen Declaration attached at Tab A to the Election Contest at ¶¶ 16, 20.

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4 *Attorneys for Plaintiff-Contestant*

5 ORIGINAL efiled and served via electronic
6 means this 14th day of December, 2022, upon:

7 Honorable Peter Thompson
8 Maricopa County Superior Court
9 c/o Sarah Umphress
10 sarah.umphress@jbazmc.maricopa.gov

11 Joseph La Rue
12 Joe Branco
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32 Attorneys for Defendant Arizona Secretary
33 of State Katie Hobbs

34 Sambo (Bo) Dul
35 State United Democracy Center
36 bo@stateuniteddemocracy.org
37 Attorneys for Defendant Arizona Secretary
38 of State Katie Hobbs

Verification

I, Kari Lake, depose and say:

I have read the foregoing Verified Petition to Inspect Ballots Pursuant to A.R.S. § 16-677 and know the contents thereof by personal knowledge. I know the allegations of the Verified Amended Petition to Inspect Ballots to be true, except the matters therein on information and belief, which I believe to be true.

Signed under penalty of perjury on this 14th day of December 2022.



Kari Lake

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27 their official capacities as members of the
28 Maricopa County Board of Supervisors;
29 Scott Jarrett, in his official capacity as
30 Maricopa County Director of Elections;
31 and the Maricopa County Board of
32 Supervisors,

33 Defendants/Contestees.

[PROPOSED] ORDER

34 Plaintiff's Amended Verified Petition to Inspect Ballots Pursuant to A.R.S. § 16-
35 677 is GRANTED. The inspection will take place in accordance with the procedures set
36 forth in A.R.S. § 16-677(C).

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DATE: _____

HONORABLE PETER THOMPSON
Judge, Maricopa County Superior Court

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