

1 Timothy A La Sota, Ariz. Bar No. 020539  
2 **TIMOTHY A. LA SOTA, PLC**  
3 2198 East Camelback Road, Suite 305  
4 Phoenix, Arizona 85016  
5 (602) 515-2649  
6 [tim@timlasota.com](mailto:tim@timlasota.com)  
7 *Attorneys for Plaintiff in Intervention Abraham*  
8 *Hamadeh*

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

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

No.CV2022-015915

IN THE MATTER OF the November 8,  
2022, General Election for Attorney  
General; Superintendent of Public  
Instruction; and State Representative for  
District 13

**MOTION TO INTERVENE**

(assigned to the Honorable Timothy J.  
Thomason)

Abraham Hamadeh respectfully moves to intervene in this matter. Mr. Hamadeh is the Republican nominee for Arizona Attorney General. His Democratic opponent Kris Mayes is already an Intervenor.

Media reports suggest that the recount will reveal a major movement of votes in favor of Mr. Hamadeh. ABC News' Garret Archer [reported](#) the following last night: "I am hearing there will be a significant discrepancy in favor of @AbrahamHamadeh in the recount results under seal until tomorrow morning. I'm told that the discrepancy will bring the race much closer."

Rule 24(a), Ariz. R. Civ. P. provides that "[o]n timely motion, the court must permit anyone to intervene who...claims an interest relating to the subject of the action,

1 and is so situated that disposing of the action in the person's absence may as a practical  
2 matter impair or impede the person's ability to protect that interest, unless existing parties  
3 adequately represent that interest.”

4 Mr. Hamadeh has participated in this matter thus far as an amicus, but now seeks  
5 intervention. Under the circumstances, it is timely. The only other party to this matter,  
6 the Secretary of State, is trying to rush through the certification process despite the  
7 significant questions that remain in this razor thin election, questions that are only  
8 amplified if the media reports are true.

9 Mr. Hamadeh has filed an election contest of this matter. Mohave County Superior  
10 Court No. CV2022-01468. The Superior Court ruled against Mr. Hamadeh, but he will  
11 file a special action seeking relief in the Arizona Supreme Court today.

12 This motion is accompanied by the proposed Answer in Intervention. Mr.  
13 Hamadeh respectfully requests that he be permitted to intervene. If the media report cited  
14 proves inaccurate, Mr. Hamadeh will withdraw his motion.  
15

16 **RESPECTFULLY SUBMITTED** this 29<sup>th</sup> day of December, 2022.

17 By: /s Timothy A. La Sota

18 Timothy A La Sota, SBN # 020539

19 **TIMOTHY A. LA SOTA, PLC**

20 2198 East Camelback Road, Suite 305

21 Phoenix, Arizona 85016

22  
23 **ORIGINAL** of the foregoing was e-  
24 filed via TurboCourt this 29<sup>th</sup> day of  
25 December, 2022 with the Maricopa  
County Superior Court Clerk.

26 **COPY** of the foregoing emailed this 29<sup>th</sup> day  
27 of December, 2022 to:

28 D. Andrew Gaona (028414)

1 Kristen Yost (034052)  
2 **COPPERSMITH BROCKELMAN PLC**  
3 2800 North Central Avenue, Suite 1900  
4 Phoenix, Arizona 85004  
5 T: (602) 381-5478  
6 [agaona@cblawyers.com](mailto:agaona@cblawyers.com)

7 Bo Dul (she/her)  
8 Senior Counsel  
9 **States United Democracy Center**  
10 480.253.9651 | [@statesunited](https://www.instagram.com/statesunited)  
11 8205 South Priest Drive, #10312  
12 Tempe, AAZ 85284  
13 [bo@statesuniteddemocracy.org](mailto:bo@statesuniteddemocracy.org)  
14 *Attorneys for Secretary of State*

15 Daniel C. Barr  
16 Alexis E. Danneman  
17 Austin Yost  
18 Samantha J. Burke  
19 Perkins Coie LLP  
20 2901 North Central Avenue  
21 Suite 2000  
22 Phoenix, AZ 85012  
23 [dbarr@perkinscoie.com](mailto:dbarr@perkinscoie.com)  
24 [adanneman@perkinscoie.com](mailto:adanneman@perkinscoie.com)  
25 [ayost@perkinscoie.com](mailto:ayost@perkinscoie.com)  
26 [sburke@perkinscoie.com](mailto:sburke@perkinscoie.com)  
27 *Attorneys for Kris Mayes*

28 /s/ Timothy A. La Sota

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

RETRIEVED FROM DEMOCRACYDOCKET.COM

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**VERIFICATION**

Pursuant to A.R.S. § 16-673(B), I, Abraham Hamadeh, hereby verify that the allegations contained in the foregoing Statement of Election Contest are true and correct to the best of my knowledge.

Executed under penalty of perjury, this 8th day of December, 2022.

\_\_\_\_\_  
Abraham Hamadeh

**VERIFICATION**

Pursuant to A.R.S. § 16-673(B), I, Ted Boyd, hereby verify that the allegations contained in the foregoing Statement of Election Contest are true and correct to the best of my knowledge.

Executed under penalty of perjury, this 8th day of December, 2022.

\_\_\_\_\_  
Ted Boyd

**VERIFICATION**

Pursuant to A.R.S. § 16-673(B), I, Jeanne Kentch hereby verify that the allegations contained in the foregoing Statement of Election Contest are true and correct to the best of my knowledge.

Executed under penalty of perjury, this 8th day of December, 2022.

\_\_\_\_\_  
Jeanne Kentch