

HONORABLE TIFFANY M. CARTWRIGHT

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT TACOMA

WASHINGTON STATE ALLIANCE FOR  
RETIRED AMERICANS,

No. 3:23-cv-06014-TMC

Plaintiff,

vs.

DEFENDANT HALL'S  
ANSWER AND AFFIRMATIVE DEFENSES  
TO PLAINTIFF'S AMENDED  
COMPLAINT FOR DECLARATORY AND  
INJUNCTIVE RELIEF

STEVE HOBBS, in his official capacity as  
Washington State Secretary of State, MARY  
HALL, in her official capacity as Thurston County  
Auditor, and JULIE WISE, in her official capacity  
as King County Elections Director,

Defendants.

Defendant Thurston County Auditor Mary Hall, by and through the undersigned counsel,  
hereby answers Plaintiff's Amended Complaint for Declaratory and Injunctive Relief (ECF No. 16,  
November 20, 2023), on information and belief as set forth below. References to paragraphs in this  
Answer are references to the numbered paragraphs in the Amended Complaint.

The paragraph found before the first numbered paragraph of the Amendment Complaint is a  
statement of the case to which no response is required. To the extent a response is required,  
Defendant Hall admits that Plaintiff has brought a suit seeking declaratory and injunctive relief, but  
avers that Plaintiff is not entitled to any relief. Defendant Hall denies any remaining allegations in  
the introductory paragraph.

**NATURE OF THE CASE**<sup>1</sup>

1. In answering paragraph 1 of Plaintiff's Amended Complaint, the paragraph contains legal conclusions and argument to which no answer is required. To the extent that an answer is required, Defendant Hall denies all allegations in this paragraph.
2. In answering paragraph 2 of Plaintiff's Amended Complaint, the paragraph contains legal conclusions and argument to which no answer is required. Paragraph 2 contains a partial quotation of a statute; that statute speaks for itself, but Defendant Hall admits that Plaintiff's partial quotation appears accurate. To the extent that an answer is required, Defendant Hall denies all remaining allegations in this paragraph.
3. In answering paragraph 3 of Plaintiff's Amended Complaint, the paragraph contains legal conclusions and argument to which no answer is required. To the extent that an answer is required, Defendant Hall denies all allegations in this paragraph.
4. In answering paragraph 4 of Plaintiff's Amended Complaint, the paragraph contains legal conclusions and argument to which no answer is required. To the extent that an answer is required, Defendant Hall denies all allegations in this paragraph.
5. In answering paragraph 5 of Plaintiff's Amended Complaint, the paragraph contains legal conclusions and argument to which no answer is required. To the extent that an answer is required, Defendant Hall denies all allegations in this paragraph.

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<sup>1</sup> Defendant Hall has included the headings listed in the Amended Complaint simply to assist in reading the pleadings and does not admit the accuracy of those headings to the extent that they can be construed as asserting allegations of fact.

- 1 6. In answering paragraph 6 of Plaintiff's Amended Complaint, the paragraph contains legal  
2 conclusions and argument to which no answer is required. To the extent that an answer is  
3 required, Defendant Hall denies all allegations in this paragraph.
- 4 7. In answering paragraph 7 of Plaintiff's Amended Complaint, the paragraph contains legal  
5 conclusions and argument to which no answer is required. Paragraph 7 contains a partial  
6 quotation of the Washington State Constitution; the Constitution speaks for itself, but  
7 Defendant Hall admits that Plaintiff's partial quotation appears accurate. To the extent that an  
8 answer is required, Defendant Hall denies all remaining allegations in this paragraph.
- 9 8. In answering paragraph 8 of Plaintiff's Amended Complaint, the paragraph contains legal  
10 conclusions and argument to which no answer is required. To the extent that an answer is  
11 required, Defendant Hall denies all allegations in this paragraph.
- 12 9. In answering paragraph 9 of Plaintiff's Amended Complaint, the paragraph contains legal  
13 conclusions and argument to which no answer is required. To the extent that an answer is  
14 required, Defendant Hall denies all allegations in this paragraph.
- 15 10. In answering paragraph 10 of Plaintiff's Amended Complaint, the paragraph contains legal  
16 conclusions and argument to which no answer is required. To the extent that an answer is  
17 required, Defendant Hall denies all allegations in this paragraph.
- 18 11. In answering paragraph 11 of Plaintiff's Amended Complaint, the paragraph contains legal  
19 conclusions and argument to which no answer is required. To the extent a response is  
20 required, Defendant Hall admits only that Plaintiff has brought a suit seeking declaratory and  
21 injunctive relief, but avers that Plaintiff is not entitled to any relief. Defendant Hall denies  
22 any remaining allegations in this paragraph.  
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**JURISDICTION AND VENUE**

12. In answering paragraph 12 of Plaintiff's Amended Complaint, the paragraph contains legal conclusions and argument to which no answer is required. To the extent that an answer is required, Defendant Hall denies all allegations in this paragraph.

13. In answering paragraph 13 of Plaintiff's Amended Complaint, the paragraph contains legal conclusions and argument to which no answer is required. To the extent that an answer is required, Defendant Hall denies all allegations in this paragraph.

14. In answering paragraph 14 of Plaintiff's Amended Complaint, the paragraph contains legal conclusions and argument to which no answer is required. To the extent that an answer is required, Defendant Hall denies all allegations in this paragraph.

15. In answering paragraph 15 of Plaintiff's Amended Complaint, the paragraph contains legal conclusions and argument to which no answer is required. To the extent that an answer is required, Defendant Hall denies all allegations in this paragraph.

16. In answering paragraph 16 of Plaintiff's Amended Complaint, the paragraph contains legal conclusions and argument to which no answer is required. To the extent that an answer is required, Defendant Hall denies all allegations in this paragraph.

**PARTIES**

17. In answering paragraph 17 of Plaintiff's Amended Complaint, Defendant Hall lacks sufficient knowledge or information to admit or deny the allegations, and on that basis denies all the allegations in this paragraph.

18. In answering paragraph 18 of Plaintiff's Amended Complaint, Defendant Hall lacks sufficient knowledge or information to admit or deny the allegations, and on that basis denies all the allegations in this paragraph.

1 19. In answering paragraph 19 of Plaintiff's Amended Complaint, the paragraph contains legal  
2 conclusions and argument to which no answer is required. Defendant Hall admits that Steve  
3 Hobbs is the Secretary of State of Washington and that Plaintiff has named Secretary Hobbs  
4 in this lawsuit in his official capacity. To that extent that an answer is required, Defendant  
5 Hall denies all remaining allegations in this paragraph.

6 20. In answering paragraph 20 of Plaintiff's Amended Complaint, the paragraph contains legal  
7 conclusions and argument to which no answer is required. Defendant Hall admits that she is  
8 the Thurston County Auditor, that she performs the duties of her office according to law, and  
9 that Olympia is the capital of Washington State and is located within Thurston County.  
10 Defendant Hall further admits that Julie Wise is the elected Director of King County  
11 Elections, that Seattle is located within King County, Washington, and that King County is  
12 the most populous county in Washington State. Defendant Hall further admits that Plaintiff  
13 has named Auditor Hall and Director Wise in this lawsuit in their official capacities. To that  
14 extent that an answer is required, Defendant Hall denies all remaining allegations in this  
15 paragraph.  
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18 **STATEMENT OF FACTS AND LAW**

19 **I. Washington state law requires voters to reside at their address for at least  
20 30 days before the election in which they seek to vote.**

21 21. In answering paragraph 21 of Plaintiff's Amended Complaint and the immediately preceding  
22 heading, the heading and paragraph contain legal conclusions and argument to which no  
23 answer is required. To the extent that an answer is required, Defendant Hall denies all  
24 allegations in this paragraph and in the immediately preceding heading.  
25

1 22. In answering paragraph 22 of Plaintiff's Amended Complaint, the paragraph contains legal  
2 conclusions and argument to which no answer is required. Paragraph 22 contains a partial  
3 quotation of the Washington State Constitution; the Constitution speaks for itself, but  
4 Defendant Hall admits that Plaintiff's partial quotation appears accurate. To the extent that an  
5 answer is required, Defendant Hall denies all remaining allegations in this paragraph.

6 23. In answering paragraph 23 of Plaintiff's Amended Complaint, the paragraph contains legal  
7 conclusions and argument to which no answer is required. To the extent that an answer is  
8 required, Defendant Hall denies all allegations in this paragraph.

9 24. In answering paragraph 24 of Plaintiff's Amended Complaint, the paragraph contains legal  
10 conclusions and argument to which no answer is required. To the extent that an answer is  
11 required, Defendant Hall denies all allegations in this paragraph.

12 25. In answering paragraph 25 of Plaintiff's Amended Complaint, the paragraph contains legal  
13 conclusions and argument to which no answer is required. Paragraph 25 contains partial  
14 quotations of Washington statutes; the statutes speak for themselves, but Defendant Hall  
15 admits that Plaintiff's partial quotations appear accurate. To the extent that an answer is  
16 required, Defendant Hall denies all remaining allegations in this paragraph.

17 26. In answering paragraph 26 of Plaintiff's Amended Complaint, the paragraph contains legal  
18 conclusions and argument to which no answer is required. Paragraph 26 contains a partial  
19 quotation of a statute; that statute speaks for itself, but Defendant Hall admits that Plaintiff's  
20 partial quotation appears accurate. To the extent that an answer is required, Defendant Hall  
21 denies all remaining allegations in this paragraph.

22 27. In answering paragraph 27 of Plaintiff's Amended Complaint, the paragraph contains legal  
23 conclusions and argument to which no answer is required. Paragraph 27 contains a partial  
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1 quotation of Washington Administrative Code; that regulation speaks for itself, but Defendant  
2 Hall admits that Plaintiff's partial quotation appears accurate. To the extent that an answer is  
3 required, Defendant Hall denies all remaining allegations in this paragraph.

4 28. In answering paragraph 28 of Plaintiff's Amended Complaint, the paragraph contains legal  
5 conclusions and argument to which no answer is required. To the extent that an answer is  
6 required, Defendant Hall denies all allegations in this paragraph.

7 29. In answering paragraph 29 of Plaintiff's Amended Complaint, the paragraph contains legal  
8 conclusions and argument to which no answer is required. To the extent that an answer is  
9 required, Defendant Hall denies all allegations in this paragraph.  
10

11 **II. The Durational Residency Requirement prohibits otherwise-eligible**  
12 **Washington voters who have recently moved from participating in elections affecting**  
13 **them in their new home.**

14 30. In answering paragraph 30 of Plaintiff's Amended Complaint and the immediately preceding  
15 heading, the heading and paragraph contain legal conclusions and argument to which no  
16 answer is required. To the extent an answer is required, Defendant Hall denies all allegations  
17 in this paragraph and in the immediately preceding heading. To the extent the paragraph or  
18 heading contain factual allegations regarding individual voters, Defendant Hall lacks  
19 sufficient knowledge or information to admit or deny the allegations, and on that basis denies  
20 all the factual allegations in this paragraph and in the immediately preceding heading.

21 31. In answering paragraph 31 of Plaintiff's Amended Complaint, the paragraph contains legal  
22 conclusions and argument to which no answer is required. To the extent an answer is  
23 required, Defendant Hall denies all allegations in this paragraph. To the extent the paragraph  
24 contains factual allegations regarding individual voters, Defendant Hall lacks sufficient  
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1 knowledge or information to admit or deny the allegations, and on that basis denies all the  
2 factual allegations in this paragraph.

3 32. In answering paragraph 32 of Plaintiff's Amended Complaint, the paragraph contains legal  
4 conclusions and argument to which no answer is required. To the extent that an answer is  
5 required, Defendant Hall denies all allegations in this paragraph.

6 33. In answering paragraph 33 of Plaintiff's Amended Complaint, the paragraph contains legal  
7 conclusions and argument to which no answer is required. To the extent that an answer is  
8 required, Defendant Hall denies all allegations in this paragraph.

9 34. In answering paragraph 34 of Plaintiff's Amended Complaint, the paragraph contains legal  
10 conclusions and argument to which no answer is required. To the extent an answer is  
11 required, Defendant Hall denies all allegations in this paragraph. To the extent the paragraph  
12 contains factual allegations regarding individual voters, Defendant Hall lacks sufficient  
13 knowledge or information to admit or deny the allegations, and on that basis denies all the  
14 factual allegations in this paragraph.

15 35. In answering paragraph 35 of Plaintiff's Amended Complaint, the paragraph contains legal  
16 conclusions and argument to which no answer is required. To the extent an answer is  
17 required, Defendant Hall denies all allegations in this paragraph. To the extent the paragraph  
18 contains factual allegations regarding individual voters, Defendant Hall lacks sufficient  
19 knowledge or information to admit or deny the allegations, and on that basis denies all the  
20 factual allegations in this paragraph.

21 36. In answering paragraph 36 of Plaintiff's Amended Complaint, the paragraph contains legal  
22 conclusions and argument to which no answer is required. To the extent an answer is  
23 required, Defendant Hall denies all allegations in this paragraph. To the extent the paragraph  
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1 contains factual allegations regarding individual voters, Defendant Hall lacks sufficient  
2 knowledge or information to admit or deny the allegations, and on that basis denies all the  
3 factual allegations in this paragraph.

4 **III. Under the VRA, states may not deny otherwise qualified voters the right**  
5 **to vote in presidential elections based on the duration they have resided in that state.**

6 37. In answering paragraph 37 of Plaintiff's Amended Complaint and the immediately preceding  
7 heading, the heading and paragraph contain legal conclusions and argument to which no  
8 answer is required. Paragraph 37 contains a partial quotation of a statute; that statute speaks  
9 for itself, but Defendant Hall admits that Plaintiff's partial quotation appears accurate. To the  
10 extent that an answer is required, Defendant Hall denies all remaining allegations in this  
11 paragraph and in the immediately preceding heading.

12 38. In answering paragraph 38 of Plaintiff's Amended Complaint, the paragraph contains legal  
13 conclusions and argument to which no answer is required. Paragraph 38 contains a partial  
14 quotation of a statute; that statute speaks for itself, but Defendant Hall admits that Plaintiff's  
15 partial quotation appears accurate. To the extent that an answer is required, Defendant Hall  
16 denies all remaining allegations in this paragraph.

17 39. In answering paragraph 39 of Plaintiff's Amended Complaint, the paragraph contains legal  
18 conclusions and argument to which no answer is required. To the extent that an answer is  
19 required, Defendant Hall denies all allegations in this paragraph.

20 40. In answering paragraph 40 of Plaintiff's Amended Complaint, the paragraph contains legal  
21 conclusions and argument to which no answer is required. Paragraph 40 contains a partial  
22 quotation of New York and Nevada statutes; those statutes speaks for themselves, but  
23 Defendant Hall admits that Plaintiff's partial quotations appear accurate. To the extent that an  
24 answer is required, Defendant Hall denies all remaining allegations in this paragraph.  
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1 41. In answering paragraph 41 of Plaintiff's Amended Complaint, the paragraph contains legal  
2 conclusions and argument to which no answer is required. To the extent that an answer is  
3 required, Defendant Hall denies all allegations in this paragraph.

4 **IV. The U.S. Constitution also prohibits states from denying the right to vote**  
5 **to otherwise qualified voters who do not satisfy the Durational Residency**  
6 **Requirement.**

7 42. In answering paragraph 42 of Plaintiff's Amended Complaint and the immediately preceding  
8 heading, the heading and paragraph contain legal conclusions and argument to which no  
9 answer is required. To the extent that an answer is required, Defendant Hall denies all  
10 allegations in this paragraph and in the immediately preceding heading.

11 43. In answering paragraph 43 of Plaintiff's Amended Complaint, the paragraph contains legal  
12 conclusions and argument to which no answer is required. To the extent that an answer is  
13 required, Defendant Hall denies all allegations in this paragraph.

14 44. In answering paragraph 44 of Plaintiff's Amended Complaint, the paragraph contains legal  
15 conclusions and argument to which no answer is required. To the extent that an answer is  
16 required, Defendant Hall denies all allegations in this paragraph.

17 45. In answering paragraph 45 of Plaintiff's Amended Complaint, the paragraph contains legal  
18 conclusions and argument to which no answer is required. To the extent that an answer is  
19 required, Defendant Hall denies all allegations in this paragraph.

20 46. In answering paragraph 46 of Plaintiff's Amended Complaint, the paragraph contains legal  
21 conclusions and argument to which no answer is required. To the extent an answer is  
22 required, Defendant Hall denies all allegations in this paragraph. To the extent the paragraph  
23 contains factual allegations regarding individual voters, Defendant Hall lacks sufficient  
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1 knowledge or information to admit or deny the allegations, and on that basis denies all the  
2 factual allegations in this paragraph.

3 47. In answering paragraph 47 of Plaintiff's Amended Complaint, the paragraph contains legal  
4 conclusions and argument to which no answer is required. To the extent an answer is  
5 required, Defendant Hall denies all allegations in this paragraph. To the extent the paragraph  
6 contains factual allegations regarding individual voters, Defendant Hall lacks sufficient  
7 knowledge or information to admit or deny the allegations, and on that basis denies all the  
8 factual allegations in this paragraph.

9 48. In answering paragraph 45 of Plaintiff's Amended Complaint, the paragraph contains legal  
10 conclusions and argument to which no answer is required. To the extent that an answer is  
11 required, Defendant Hall denies all allegations in this paragraph.  
12

13 **CLAIM FOR RELIEF**

14 **COUNT I**

15 **Voting Rights Act Section 202**

16 **52 U.S.C. § 10502; 42 U.S.C. § 1983; 28 U.S.C. §§ 2201, 2202**

17 49. In answering paragraph 49 of Plaintiff's Amended Complaint, Defendant Hall incorporates all  
18 responses and denials as set forth in the previous paragraphs.

19 50. In answering paragraph 50 of Plaintiff's Amended Complaint, the paragraph contains legal  
20 conclusions and argument to which no answer is required. Paragraph 50 contains a partial  
21 quotation of a statute; that statute speaks for itself, but Defendant Hall admits that Plaintiff's  
22 partial quotation appears accurate. To the extent that an answer is required, Defendant Hall  
23 denies all remaining allegations in this paragraph.  
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1 51. In answering paragraph 51 of Plaintiff's Amended Complaint, the paragraph contains legal  
2 conclusions and argument to which no answer is required. Paragraph 51 contains a partial  
3 quotation of a statute; that statute speaks for itself, but Defendant Hall admits that Plaintiff's  
4 partial quotation appears accurate. To the extent that an answer is required, Defendant Hall  
5 denies all remaining allegations in this paragraph.

6 52. In answering paragraph 52 of Plaintiff's Amended Complaint, the paragraph contains legal  
7 conclusions and argument to which no answer is required. Paragraph 52 contains a partial  
8 quotation of a statute; that statute speaks for itself, but Defendant Hall admits that Plaintiff's  
9 partial quotation appears accurate. To the extent that an answer is required, Defendant Hall  
10 denies all remaining allegations in this paragraph.

11 53. In answering paragraph 53 of Plaintiff's Amended Complaint, the paragraph contains legal  
12 conclusions and argument to which no answer is required. Paragraph 53 contains a partial  
13 quotation of a statute; that statute speaks for itself, but Defendant Hall admits that Plaintiff's  
14 partial quotation appears accurate. To the extent that an answer is required, Defendant Hall  
15 denies all remaining allegations in this paragraph.

16 54. In answering paragraph 54 of Plaintiff's Amended Complaint, the paragraph contains legal  
17 conclusions and argument to which no answer is required. To the extent that an answer is  
18 required, Defendant Hall denies all allegations in this paragraph.

19 55. In answering paragraph 55 of Plaintiff's Amended Complaint, the paragraph contains legal  
20 conclusions and argument to which no answer is required. To the extent that an answer is  
21 required, Defendant Hall denies all allegations in this paragraph.  
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1 56. In answering paragraph 56 of Plaintiff's Amended Complaint, the paragraph contains legal  
2 conclusions and argument to which no answer is required. To the extent that an answer is  
3 required, Defendant Hall denies all allegations in this paragraph.  
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6 **COUNT II**

7 **First and Fourteenth Amendments**  
8 **U.S. Const. Amend. I and XIV; 42 U.S.C. § 1983; 28 U.S.C. §§ 2201, 2202**

9 57. In answering paragraph 57 of Plaintiff's Amended Complaint, Defendant Hall incorporates all  
10 responses and denials as set forth in the previous paragraphs.

11 58. In answering paragraph 58 of Plaintiff's Amended Complaint, the paragraph contains legal  
12 conclusions and argument to which no answer is required. To the extent that an answer is  
13 required, Defendant Hall denies all allegations in this paragraph.

14 59. In answering paragraph 59 of Plaintiff's Amended Complaint, the paragraph contains legal  
15 conclusions and argument to which no answer is required. To the extent that an answer is  
16 required, Defendant Hall denies all allegations in this paragraph.

17 60. In answering paragraph 60 of Plaintiff's Amended Complaint, the paragraph contains legal  
18 conclusions and argument to which no answer is required. To the extent that an answer is  
19 required, Defendant Hall denies all allegations in this paragraph.

20 61. In answering paragraph 61 of Plaintiff's Amended Complaint, the paragraph contains legal  
21 conclusions and argument to which no answer is required. To the extent that an answer is  
22 required, Defendant Hall denies all allegations in this paragraph.  
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1 62. In answering paragraph 62 of Plaintiff's Amended Complaint, the paragraph contains legal  
2 conclusions and argument to which no answer is required. To the extent that an answer is  
3 required, Defendant Hall denies all allegations in this paragraph.

4 63. In answering paragraph 63 of Plaintiff's Amended Complaint, the paragraph contains legal  
5 conclusions and argument to which no answer is required. To the extent that an answer is  
6 required, Defendant Hall denies all allegations in this paragraph.

7  
8 **PRAYER FOR RELIEF**

9 The remainder of the Amended Complaint constitutes Plaintiff's request for relief to which no  
10 responsive pleading is necessary. To the extent a responsive pleading is required, in answering  
11 paragraphs (a) – (d) of Plaintiff's Prayer for Relief on page 21 of Plaintiff's Amended Complaint,  
12 Defendant Hall denies that Plaintiff is entitled to any of the relief sought.

13 **AFFIRMATIVE DEFENSES**

14 BY WAY OF FURTHER ANSWER and AFFIRMATIVE DEFENSES, and without  
15 admitting anything previously denied, Defendant Hall states as follows:

- 16 1. All allegations that have not been specifically admitted are hereby denied.  
17 2. Plaintiff lacks standing to bring their claims.  
18 3. Plaintiff has failed to state a claim upon which relief may be granted.  
19 4. Defendant Hall at all times acted in good faith in the performance of her duties and is,  
20 therefore, immune from suit for the matters alleged in Plaintiff's Amended Complaint.

21 **DEFENDANT HALL'S RESERVATION OF RIGHTS**

22 Defendant Hall expressly reserves the right to amend this Answer, including the addition of  
23 affirmative defenses warranted by investigation and discovery, and to make such amendments either  
24 before or during trial, including asserting other defense theories or conforming the pleadings to the  
25 proof offered at the time of trial.

1 Defendant Hall specifically reserves the right to amend this Answer by adding counterclaims,  
2 cross claims or by instituting third party actions as additional facts are obtained through further  
3 investigation and/or discovery.

4 **DEFENDANT HALL'S PRAYER FOR RELIEF**

5 Wherefore, having answered, Defendant Hall respectfully requests judgment or relief against  
6 Plaintiff as follows:

- 7 1. That the claim against Defendant Hall is dismissed with prejudice and that the Plaintiff takes  
8 nothing and is granted no relief;
- 9 2. That Defendant Hall be awarded costs and disbursements incurred in defending this matter;  
10 and
- 11 3. Such other and further relief, including declaratory, equitable relief and damages, to which  
12 she is entitled.

13 DATED this 8<sup>th</sup> day of December 2023.

14 JON TUNHEIM  
15 PROSECUTING ATTORNEY

16 */s/ Karen Horowitz*

17 KAREN HOROWITZ, WSBA #40513  
18 Senior Deputy Prosecuting Attorney  
19 Civil Division - Building No. 5  
20 2000 Lakeridge Drive SW  
21 Olympia, WA 98502  
22 Phone: (360)786-5574  
23 *Karen.horowitz@co.thurston.wa.us*  
24 Attorney for Thurston County Defendant  
25

**CERTIFICATE OF SERVICE**

I hereby certify that on date listed below, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which provides service to the plaintiff listed below:

<p><b><u>Attorneys for Plaintiffs:</u></b>                  Alexis Velez - <a href="mailto:avelez@elias.law">avelez@elias.law</a>                  Marilyn Gabriela Robb - <a href="mailto:mrobb@elias.law">mrobb@elias.law</a>                  Tina Meng Morrison - <a href="mailto:tmengmorrison@elias.law">tmengmorrison@elias.law</a>                  Elias Law Group LLP (DC)                  250 Massachusetts Ave NW STE 400                  Washington, DC 20001</p> <p>Abha Khanna - <a href="mailto:akhanna@elias.law">akhanna@elias.law</a>                  William B. Stafford - <a href="mailto:bstafford@elias.law">bstafford@elias.law</a>                  Elias Law Group LLP                  1700 Seventh Ave., Suite 2100                  Seattle, WA 98101</p>	<p><input checked="" type="checkbox"/> CM/ECF  <input type="checkbox"/> Certified Mail, Return Receipt Requested  <input type="checkbox"/> Overnight Mail  <input type="checkbox"/> Hand Delivery  <input type="checkbox"/> Email</p>
<p><b><u>Defendant:</u></b>                  Steve Hobbs in his official capacity as Washington                  State Secretary of State                  416 Sid Snyder Ave SW                  Olympia, WA 98501</p>	<p><input type="checkbox"/> CM/ECF  <input checked="" type="checkbox"/> USPS  <input type="checkbox"/> Overnight Mail  <input type="checkbox"/> Hand Delivery  <input type="checkbox"/> Email</p>
<p><b><u>Attorney for Defendant Wise</u></b>                  Ann Marie Summers                  Ann.summers@kingcounty.gov                  1191 2<sup>nd</sup> Ave Ste 1700                  Seattle, WA 98101</p>	<p><input checked="" type="checkbox"/> CM/ECF  <input type="checkbox"/> USPS  <input type="checkbox"/> Overnight Mail  <input type="checkbox"/> Hand Delivery  <input type="checkbox"/> Email</p>

I certify (or declare) under penalty of perjury under the laws of the State of Washington and 28 U.S.C. § 1746 that the foregoing is true and correct. Olympia, Washington.

DATED this 8<sup>th</sup> day of December 2023.

/s/Tressa Hayes  
 Tressa Hayes