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JUL 09 2024

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IN THE SUPERIOR COURT FOR THE STATE OF ALASKA  
THIRD JUDICIAL DISTRICT AT ANCHORAGE

La Quen Náay Elizabeth Medicine )  
Crow, Amber Lee and Kevin McGee, )

Plaintiffs, )

v. )

Case No. 3AN-24-05615CI

Director Carol Beecher, in her official )  
capacity, Lt. Governor Nancy )  
Dahlstrom, in her official capacity, )  
and the State of Alaska, Division of )  
Elections, )

Defendants, )

v. )

Arthur Mathias, Phillip Izon, and )  
Jamie Donley, )

Intervenors. )

DEFENDANTS' PROPOSED FINDINGS OF FACT

I. Introduction

Following the Court's first order on summary judgment<sup>1</sup> and the parties' second stipulation,<sup>2</sup> the plaintiffs challenged the Division's decision to count two signatures. The Division presented evidence that it properly counted these two signatures and took no position on the plaintiffs' other claims at trial. The Division

<sup>1</sup> Order Re Summary Judgment (June 7, 2024).

<sup>2</sup> Stipulation and Proposed Order Regarding Signatures (June 20, 2024).

provides the following proposed findings of fact regarding these two signatures, as well as the 36 signatures the Division agreed that it improperly counted.

## II. Proposed findings of fact

1. The Division properly counted the signature in Book 470, page 5, lines 1 and 2, because this signature was dated with the month and day.

2. The Division properly counted the signature in Booklet 902, page 4, line 8, because this signature was dated with ditto marks that indicated the date was the same date as for the signature above it.

3. The Division agrees that it improperly counted the following 36 signatures: Booklet 6, page 3, lines 9–11; page 4, lines 14 and 15; and page 7, lines 3–5; Booklet 274, page 10, line 7; Booklet 275, page 4, line 7; Booklet 368, page 5, line 1; Booklet 462, page 3, line 11; Booklet 470, page 2, line 10; Booklet 569, page 4, line 5; Booklet 656, page 1, lines 8–12, 14, and 15; page 2, lines 1–3 and 10–13; page 4, line 10; Booklet 704, page 4, line 9; Booklet 926, page 2, line 4; Booklet 1291, page 2, lines 12 and 13; Booklet 1297, page 1, line 10; Booklet 1384, page 8, line 15; Booklet 1385, page 2, line 15.

DATED July 9, 2024

TREG TAYLOR  
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**CERTIFICATE OF SERVICE**

I certify that true and correct copies of the Defendants' Proposed Findings of Fact were served via email to the following:

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