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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

1789 Foundation Inc., d/b/a Citizen AG,
and Lindsey Graham,

Plaintiffs,

v.

Adrian Fontes, in his official capacity as
Arizona Secretary of State,

Defendant.

No. CV-24-02987-PHX-SPL

**STIPULATION TO STAY
PROCEEDINGS AND EXTEND
PENDING DEADLINES**

(Second Request)

Pursuant to Local Rule 7.3, Plaintiffs 1789 Foundation, Inc., d/b/a Citizen AG, and Lindsey Graham (collectively, "Plaintiffs"), Defendant Adrian Fontes, and proposed Intervenor One Arizona and Arizona Alliance for Retired Americans stipulate and agree to a 60-day stay of proceedings—until February 7, 2025—and extension of pending deadlines in this matter. In particular, the parties agree that Plaintiffs may have until February 14, 2025 to file a response to the Motion to Intervene (Doc. 19) and Defendant

1 may have until February 21, 2025 to respond to the Complaint (Doc. 1). This further
 2 extension will permit the parties to work in good faith to address issues related to the
 3 availability and provision of voter records requested by Citizen AG. Nothing herein shall
 4 prevent any party from seeking to lift the stay before its expiration to request judicial
 5 intervention regarding compliance with the Court's November 1, 2024 Order (Doc. 17) if
 6 further negotiations will not result in a mutually agreeable solution.

7 For the Court's convenience, and proposed order is lodged herewith.

8 RESPECTFULLY SUBMITTED this 12th day of December, 2024:

9 Kristin K. Mayes
 10 Attorney General

11 /s/ Karen J. Hartman-Tellez
 12 Karen J. Hartman-Tellez
 13 Kara Karlson
 14 Senior Litigation Counsel
 15 Kyle Cummings
 16 Assistant Attorney General
 17 *Attorneys for Arizona Secretary of*
 18 *State Adrian Fontes*

19 Davillier Law Group LLC

20 /s/ Neal Carter (with permission)
 21 Alexander Kolodin
 22 Veronica Lucero
 23 Neal Carter
 24 *Attorneys for Plaintiffs*

25 Elias Law Group LLP

26 /s/ Lalitha Madduri (with permission)
 27 Lalitha Madduri
 28 Chris Dodge
 Omeed Alerasool
 James J. Pinchak
 Julie Zuckerbrod
Attorneys for Proposed Intervenor-Defendants
One Arizona and the Arizona Alliance for
Retired Americans

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 12th day of December, 2024, I filed the forgoing document electronically through the CM/ECF system, which caused all parties or counsel of record to be served by electronic means, as more fully reflected on the Notice of Electronic Filing

/s/ Karen J. Hartman-Tellez

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