

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

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEVE HOBBS, in his official capacity
as Secretary of State of the State of
Washington,

Defendant.

NO. 3:25-cv-06078-SKV

DEFENDANT SECRETARY OF
STATE STEVE HOBBS'S
NOTICE RELATED TO COURT'S
ORDER TO SHOW CAUSE

1 SECRETARY STEVE HOBBS provides this notice related to the Court’s Order to Show
2 Cause. On March 17, 2025, Plaintiff filed a proof of service, in which a process server attested
3 to having “left the summons at the individual’s residence or usual place of abode with **Mia Doe**,
4 a person of suitable age and discretion who resides at **800 Fifth Avenue, Suite 2000, Seattle,**
5 **WA 98104, on 03/13/2026 at 11:08 AM.**” 800 Fifth Avenue is the address of the Washington
6 Attorney General’s Seattle Office; it is not the residence or usual place of abode of Secretary
7 Hobbs. The Proof of Service does not indicate that the person with whom the complaint and
8 summons was left was authorized to accept service **on behalf of Secretary Hobbs.**

9 Plaintiff also sought to electronically serve Secretary Hobbs on Thursday March 12,
10 2026, for which counsel for Secretary Hobbs responded by providing a waiver of service under
11 Federal Rule of Civil Procedure 4(d). *See* Exhibit A. On March 17, 2026, wholly different
12 counsel sought to electronically serve Secretary Hobbs without acknowledging the Secretary’s
13 waiver or copying counsel for Secretary Hobbs on that communication. *See* Exhibit B.

14
15 DATED this 17th day of March, 2026.

16 NICHOLAS W. BROWN
17 *Attorney General*

18 *s/Tera M. Heintz*
19 TERA M. HEINTZ, WSBA 54921
20 KARL D. SMITH, WSBA 41988
21 CRISTINA SEPE, WSBA 53609
22 KELLY PARADIS, WSBA 47175
23 *Deputy Solicitors General*
24 1125 Washington Street SE
25 PO Box 40100
26 Olympia, WA 98504-0100
360-753-6200
Tera.Heintz@atg.wa.gov
Karl.Smith@atg.wa.gov
Cristina.Sepe@atg.wa.gov
Kelly.Paradis@atg.wa.gov
Attorneys for Defendant Steve Hobbs

From: [Heintz, Tera M. \(ATG\)](mailto:Heintz.Tera.M@atg.wa.gov)
To: "John.Casali@usdoj.gov"
Cc: "Raymond.Yang@usdoj.gov"; "Eric.Neff@usdoj.gov"; [Smith, Karl D. \(ATG\)](#); [Sepe, Cristina \(ATG\)](#); [Paradis, Kelly A. \(ATG\)](#)
Subject: FW: Service on Secretary of State 3:25-cv-06078-SKV
Date: Friday, March 13, 2026 11:18:00 AM
Attachments: [image001.png](#)
[Waiver.pdf](#)

John:

I represent Secretary Hobbs in the above referenced matter. Attached is Secretary Hobbs's waiver of service, subject to all requirements and reservations of rights set forth in FRCP 4(d).

Regards,

Tera

Tera M. Heintz
Deputy Solicitor General
360-664-3027

From: Casali, John (CRT) <John.Casali@usdoj.gov>
Sent: Thursday, March 12, 2026 2:07 PM
To: ATG MI Service Documents <ServiceATG@atg.wa.gov>
Cc: Yang, Raymond (CRT) <Raymond.Yang@usdoj.gov>; Neff, Eric (CRT) <Eric.Neff@usdoj.gov>
Subject: Service on Secretary of State 3:25-cv-06078-SKV

[EXTERNAL]

Good afternoon,

Attached to this email you will find a Summons addressed to Secretary of State Steve Hobbs as well as a Complaint, Motion to Compel, Proposed Order, and Declaration filed under 3:25-cv-06078-SKV in the United States District Court for the Western District of Washington.

We ask that you confirm receipt and, if possible, provide us with an **Acknowledgment of Personal Service**. Thank you.

Respectfully,

John R. Casali
Trial Attorney
Civil Rights Division | Voting Section
U.S. Department of Justice
4 Constitution Square
150 M Street NE, Room 8.135
Washington, D.C. 20002

Mobile Work: (202) 316-8087
John.Casali @usdoj.gov



AO 399 (01/09) Waiver of the Service of Summons

UNITED STATES DISTRICT COURT

for the

Western District of Washington

United States of America

Plaintiff

v.

Steve Hobbs

Defendant

Civil Action No. 3:25-cv-06078-SKV

WAIVER OF THE SERVICE OF SUMMONS

To: John R. Casali

(Name of the plaintiff's attorney or unrepresented plaintiff)

I have received your request to waive service of a summons in this action along with a copy of the complaint, two copies of this waiver form, and a prepaid means of returning one signed copy of the form to you.

I, or the entity I represent, agree to save the expense of serving a summons and complaint in this case.

I understand that I, or the entity I represent, will keep all defenses or objections to the lawsuit, the court's jurisdiction, and the venue of the action, but that I waive any objections to the absence of a summons or of service.

I also understand that I, or the entity I represent, must file and serve an answer or a motion under Rule 12 within 60 days from 03/13/2026, the date when this request was sent (or 90 days if it was sent outside the United States). If I fail to do so, a default judgment will be entered against me or the entity I represent.

Date: 03/13/2026

s/Tera Heintz

Signature of the attorney or unrepresented party

Tera Heintz

Printed name of party waiving service of summons

Tera Heintz

Printed name

1125 Washington Street SE
PO Box 40100
Olympia, WA 98504-0100

Address

tera.heintz@atg.wa.gov

E-mail address

(360) 753-6200

Telephone number

Duty to Avoid Unnecessary Expenses of Serving a Summons

Rule 4 of the Federal Rules of Civil Procedure requires certain defendants to cooperate in saving unnecessary expenses of serving a summons and complaint. A defendant who is located in the United States and who fails to return a signed waiver of service requested by a plaintiff located in the United States will be required to pay the expenses of service, unless the defendant shows good cause for the failure.

"Good cause" does *not* include a belief that the lawsuit is groundless, or that it has been brought in an improper venue, or that the court has no jurisdiction over this matter or over the defendant or the defendant's property.

If the waiver is signed and returned, you can still make these and all other defenses and objections, but you cannot object to the absence of a summons or of service.

If you waive service, then you must, within the time specified on the waiver form, serve an answer or a motion under Rule 12 on the plaintiff and file a copy with the court. By signing and returning the waiver form, you are allowed more time to respond than if a summons had been served.

From: [Johnson, Kristin B. \(USAAWAW\)](#)
To: [ATG MI Service Documents](#)
Cc: [Froelich, Caitlin \(USAAWAW\)](#); [Kipnis, Brian \(USAAWAW\)](#)
Subject: Service of Summons and Complaint U.S. v. Hobbs, 3:25-cv-06078-SKV
Date: Tuesday, March 17, 2026 10:18:35 AM
Attachments: [Complaint \(Dkt 1\).pdf](#)
[Summons \(Dkt 3\).pdf](#)

[EXTERNAL]

Good morning. Please find the attached summons and complaint (with attachments) for service on Defendant Steve Hobbs, in his official capacity as Secretary of State of the State of Washinton.

Please note that we require an Acknowledgement of Service and cannot accept a Waiver.

Thank you for your attention to this matter. Please contact me directly if you have any questions or concerns.

Kristin Johnson
Assistant United States Attorney
(206) 553-4576