

STATE OF MINNESOTA
IN SUPREME COURT



Minnesota Voters Alliance; Diane Napper,

Petitioners,

v.

City of Minneapolis; Casey Carl, in his official capacity as City Clerk of the City of Minneapolis,

Respondents.

Appellate Case No. A26-0997

PETITIONERS' MEMORANDUM

Pursuant to Chief Justice Hudson's Order of June 12, 2026, Petitioners Minnesota Voters Alliance and Diane Napper submit the following:

Genuine Issues of Material Fact in Dispute

Petitioners do not believe there are any issues of material fact in dispute. This case presents a purely legal question on the merits: whether early voting polling places must be staffed with party-balanced election judges.

Potentially Dispositive Threshold Legal Issues

Petitioners do not believe there are any potentially dispositive threshold legal issues for the Court to consider. The only issue presented by this case is the legal issue on the merits identified above.

The Relevant Date by Which a Decision of the Court Is Necessary

Petitioners' requested relief is an order requiring the City of Minneapolis to hire and schedule party-balanced election judges for the early voting period,

which begins on October 16. To allow time for that hiring and training to occur, a decision of the Court would be necessary some weeks before that date. Petitioners suggest a decision by early September.

Proposed Briefing Schedule

Petitioners propose the following briefing schedule for the Court's consideration:

- Petitioners' Brief due 7 days after entry of the Court's scheduling order.
- Respondents' and Secretary of State's Briefs due 17 days after Petitioners' Brief.
- Petitioners' Reply Brief due 10 days after Respondents' and Secretary of State's Briefs.

Respectfully submitted,

Dated: June 17, 2026

UPPER MIDWEST LAW CENTER

/s/ Nicholas J. Nelson

Douglas P. Seaton (#127759)

Nicholas J. Nelson (#391984)

Austin M. Lysy (#505052)

12600 Whitewater Dr., Suite 140

Minnetonka, Minnesota 55343

doug.seaton@umlc.org

nicholas.nelson@umlc.org

austin.lysy@umlc.org

(612) 428-7000

Attorneys for Petitioners