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Attorneys for the Plaintiff

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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

United States of America,

Plaintiff,

v.

State of Alaska; Carol Beecher, in her official capacity as Director of the Division of Elections of the State of Alaska; the Election Boards of the State of Alaska; and the State Ballot Counting Review Board of the State of Alaska,

Defendants,

and

Civ. No. 3:26-cv-00376-SLG

PLAINTIFF'S MOTION FOR EXPEDITED CONSIDERATION OF ITS MOTION FOR EXPEDITED DISCOVERY AND PRELIMINARY INJUNCTION

Alaskans for Mary, Democratic Senatorial Campaign Committee Risé Roy, Jan Jakub Grzeda, League of Women Voters of Alaska, and Common Cause,

Intervenor-Defendants.

The United States respectfully moves the Court for expedited consideration of its Motion for Expedited Discovery and Preliminary Injunction, with a decision requested by **Monday, November 2, 2026**.

Local Rule 7.3(a) permits expedited consideration of an underlying motion for "good cause." As explained in the accompanying declaration of counsel, for both the expedited discovery and the preliminary injunction, that standard is satisfied.

First, as the Court is aware, Election Day is on November 3. As the United States set forth in its Amended Complaint and Motion, there is a substantial risk that Mr. Sullivan's sham candidacy will mislead voters and ultimately result in an electoral process that lacks integrity.

To guard against this danger, the United States seeks an order directing Defendants to preserve and segregate all ballots ranking Daniel J. Sullivan for the purposes of investigating whether such ranking was the product of voter confusion, should such an investigation become necessary. These modest precautionary measures will be impossible after Election Day, so there is good cause for expedited consideration.

Second, according to the New York Times's recent reporting, Mr. Sullivan did not run his sham campaign alone. Rather, it appears that the Pelota Campaign and the

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Democratic Senatorial Campaign Committee orchestrated a conspiracy to recruit him for this fraudulent candidacy for the purpose of aiding Pelota. The United States seeks an order allowing expedited discovery on the topics of (1) Intervenor Alaskans for Mary's internal and external conversations regarding its efforts to recruit Daniel J. Sullivan to run for office, and (2) Intervenor Democratic Senatorial Campaign Committee internal and external conversations regarding its efforts recruit Daniel J. Sullivan to run for office. Alaskans deserve to understand the details of this conspiracy. There is therefore good cause for this targeted expedited discovery.

The United States respectfully moves for expedited consideration of its Motion for Expedited Discovery and Preliminary Injunction, with a decision requested by Monday, **November 2, 2026**.

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Dated: October 30, 2026

Respectfully submitted,

/s/ Stanley Woodward
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Certificate of Service

I hereby certify that on October 30, 2026, a true and correct copy of the foregoing document was served electronically through the CM/ECF system upon all case participants who are registered CM/ECF users.

/s/ E. Bryan Wilson
Office of the U.S. Attorney