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

In the Matter of the)
2021 REDISTRICTING PLAN.) Case No. 3AN-21-08869C))

REPLY IN SUPPORT OF MOTION TO REJECT AMENDED REDISTRICTING PROCLAMATION PLAN AND FOR MODIFICATION OF ORDER ON REMAND

In the interest of expediting consideration of their Motion to Reject Amended Redistricting Proclamation Plan and for Modification of Order on Remand (the "Motion"), Felisa Wilson, George Martinez, and Yarrow Silvers (collectively the "East Anchorage Plaintiffs") stand on the merits of that Motion, the Superior Court Findings of Fact and Conclusions of Law, and the Alaska Supreme Court summary Order. East Anchorage Plaintiffs have not, nor did they intend to, file a new challenge or trigger a renewed Civil Rule 90.8 application process, nor do East Anchorage Plaintiffs have the financial ability

to fund such an effort.¹ Instead, the East Anchorage Plaintiffs' Motion only seeks full compliance from the Alaska Redistricting Board with this Court's remand order.

DATED this 20th day of April, 2022.

BIRCH HORTON BITTNER & CHEROT Attorneys for East Anchorage Plaintiffs

By: /s/Holly C. Wells

Holly C. Wells, ABA #0511113 Mara E. Michaletz, ABA #0803007 Zoe A. Danner, ABA #1911094

In this Court's March 30, 2022 Order Following Remand from the Alaska Supreme Court, the Court expressly retained jurisdiction to "address any further issues arising from the Board's corrections or related issues in a timely manner." In light of this continued exercise of jurisdiction, East Anchorage Plaintiffs are in no way precluded by principles of *res judicata* or collateral estoppel from timely moving, as they did, for clarification or modification of previously-entered orders in the same proceeding.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 20th day of April, 2022, a true and correct copy of the foregoing Reply in Support of Motion to Reject Amended Proclamation Plan or for Modification of Order on Remand (3 pp) was served electronically on the following:

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