

1 BRYAN CAVE LEIGHTON PAISNER LLP (No. 00145700)  
2 Lawrence G. Scarborough (No. 006965) (lgscarborough@bclplaw.com)  
3 Jessica R. Maziarz (No. 027353) (jessica.maziarz@bclplaw.com)  
4 Teresa P. Meece (No. 032071) (teresa.meece@bclplaw.com)  
5 Julie M. Birk (No. 033908) (julie.birk@bclplaw.com)  
6 Two North Central Avenue, Suite 2100  
7 Phoenix, Arizona 85004-4406  
8 Telephone: (602) 364-7000

9 Attorneys for Plaintiffs

10 [Additional counsel listed on signature page]

11  
12 **UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF ARIZONA**

14 League of Women Voters of Arizona; Mi  
15 Familia Vota Education Fund; and Promise  
16 Arizona, on behalf of themselves, their  
17 members, and all others similarly situated,

18 Plaintiffs,

19 vs.

20 Katie Hobbs, in her official capacity as Secretary  
21 of State for the State of Arizona,

22 Defendant.

23 No. CV-18-02620-PHX-JAT

24  
25 **JOINT MOTION AND  
26 STIPULATION FOR DISMISSAL  
PURSUANT TO SETTLEMENT  
AGREEMENT**

27 Plaintiffs League of Women Voters of Arizona, Mi Familia Vota Education Fund, and  
28 Promise Arizona (“Plaintiffs”) and Defendant Katie Hobbs, in her official capacity as  
Secretary of State for the State of Arizona (“Defendant”), hereby stipulate and agree as  
follows:

29 WHEREAS, on January 2, 2020, the parties entered into a Settlement Agreement  
30 fully and finally resolving this action (“Settlement Agreement”).

31 WHEREAS, the Settlement Agreement, attached hereto as Exhibit A, requires the  
32 parties to jointly ask the Court to retain jurisdiction to enforce the terms of the Settlement  
33 Agreement, but otherwise dismiss the action without prejudice.

34 Therefore, in consideration of the foregoing, the parties further stipulate, agree, and  
35 respectfully request that:

1       1. In accordance with Section 4.2 of the parties' Settlement Agreement, the Court  
 2 dismiss this action, in its entirety, without prejudice, against Defendant in this matter.  
 3 Further, the parties ask the Court to vacate all remaining deadlines and hearing dates in this  
 4 matter; and

5       2. Without affecting the finality of the order of dismissal, the parties ask the Court  
 6 to retain exclusive and continuing jurisdiction to enforce the Settlement Agreement in  
 7 accordance with its terms and for its duration, as set forth in Section 7.9 of the Settlement  
 8 Agreement.

9       A proposed form of order is submitted herewith.

10      DATED this 6th day of January, 2020.

11 BRYAN CAVE LEIGHTON PAISNER LLP

12      MARK BRNOVICH  
 13      ARIZONA ATTORNEY GENERAL

14      By s/ Teresa P. Meece  
 15      Lawrence G. Scarborough  
 16      Jessica R. Maziarz  
 17      Teresa P. Meece  
 18      Julie M. Birk  
 19      Two North Central Avenue, Suite 2100  
 20      Phoenix, Arizona 85004-4406

21      Molly Brizgys  
 22      AMERICAN CIVIL LIBERTIES UNION  
 23      OF ARIZONA  
 24      P.O. Box 17148  
 25      Phoenix, Arizona 85011-0148

26      Sarah Brannon\*\*  
 27      Ceridwen Cherry  
 28      AMERICAN CIVIL LIBERTIES UNION  
 29      FOUNDATION  
 30      915 15th Street NW  
 31      Washington, DC 20005-2313

32      Stuart Naifeh  
 33      DEMOS  
 34      80 Broad St, 4th Floor  
 35      New York, New York 10004

36      Chiraag Bains\*\*  
 37      DEMOS  
 38      740 6th Street NW, 2nd Floor  
 39      Washington, DC 20001

40      By s/Kara Carlson (with permission)

41      Kara Carlson  
 42      2005 North Central Avenue  
 43      Phoenix, Arizona 85004-1592

44      Stephen W. Tully  
 45      Bradley L. Dunn  
 46      HINSHAW & CULBERTSON LLP  
 47      2375 East Camelback Road, Suite 750  
 48      Phoenix, Arizona 85016

49      Attorneys for Defendant

1       Jon Greenbaum  
2       Ezra D. Rosenberg  
3       Arusha Gordon  
4       LAWYERS' COMMITTEE FOR CIVIL  
5       RIGHTS UNDER LAW  
6       1500 K Street NW, Suite 900  
7       Washington, DC 20005

8  
9  
10      \*\* Not admitted in the District of  
11      Columbia; practice limited pursuant to D.C.  
12      App. R. 49(c)(3).

13      Attorneys for Plaintiffs

14  
15      Filed electronically with the Court and  
16      served on parties of record by the Court's  
17      CM/ECF system this 6th day of January, 2020.  
18      \_\_\_\_\_.  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

20      *s/Donna McGinnis* \_\_\_\_\_  
21  
22  
23  
24  
25  
26  
27  
28

601439206