

The Honorable Robert S. Lasnik

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

SUSAN SOTO PALMER et al.,
Plaintiffs,

v.

STEVEN HOBBS, in his official capacity
as Secretary of State of Washington, et al.,
Defendants,

and

JOSE TREVINO et al.,
Intervenor-Defendants.

Case No.: 3:22-cv-5035-RSL

INTERVENOR-DEFENDANTS’ AND
CROSS-PLAINTIFFS’ OBJECTION AND
OPPOSITION TO PLAINTIFFS’ MOTION
TO ENFORCE SUBPOENA OF JIM
TROYER OR ALTERNATIVELY TO
EXTEND DISCOVERY DEADLINE

NOTE ON MOTION CALENDAR:
January 27, 2023

ARGUMENT

Intervenor-Defendants and Cross-Plaintiffs (“Intervenors”) file this Objection and Opposition to Plaintiffs’ Motion to Enforce Subpoena of Jim Troyer or Alternatively to Extend Discovery Deadline (the “Motion”).

The Intervenors do not represent Jim Troyer. As such, this Objection and Opposition will not respond to the substance of Plaintiffs’ Motion. However, Intervenors do wish to correct the record regarding the representation that the parties, and the Court, agreed to extend all written discovery to January 6, 2023. (See Motion at 2 (“When Plaintiffs then informed Ms. Goldman that this Court had extended the written discovery deadline until January 6”). Intervenors’

1 opposition is simple: the Parties only agreed to extend a few limited and particular written
2 discovery deadlines to January 6, 2023, and the Court also only extended those same few limited
3 and particular discovery deadlines in its Order to Allow Depositions Out of Time and Extension
4 of Written Discovery Responses. (*See* Dkt. # 122.)

5 First, regarding the agreement of the Parties, attached hereto as Exhibit A are the email
6 communications between the Parties agreeing to extend certain written discovery responses to
7 January 6, 2023. On December 21, 2022, counsel for Defendant State of Washington, Andrew
8 Hughes, emailed the Parties requesting a few extra days to respond to specific, already pending,
9 written discovery requests. (*See* Ex. A at 7.) Counsel for Plaintiffs, Sonni Waknin, agreed “to
10 extend all written discovery deadlines to Jan 6, 2023.” (*Id.* at 7.) Ms. Waknin then requested “that
11 due dates for responses by Plaintiffs be extended to January 6th as well.” (*Id.*) Counsel for
12 Intervenors, Dallin Holt, responded to both the State and Plaintiffs and agreed to extend deadlines
13 and also requested an extension. (*See id.* at 6.) Mr. Holt expressly stated that any agreement to
14 extend deadlines would only pertain to “the agreed written discovery and depositions that the
15 parties have already agreed to.” (*Id.*) Counsel for Defendant Secretary of State Steve Hobbs also
16 concurred with the agreed extension of certain deadlines. (*See id.* at 5.) A draft stipulated motion
17 to extend deadlines was circulated for approval, whereupon all Parties agreed to the language of
18 the stipulated motion. (*See id.* at 1-3.) The circulated draft was identical to the motion that was
19 filed and signed by the Court. (*See* Dkt. # 121, 122.) From these communications, it is clear that
20 the Parties were only agreeing to extend certain written discovery deadlines to those requests that
21 were already pending.

22 Finally, the clear and unambiguous language of the Order, signed by the Court, limited the
23 deadline extension to requests “that are presently served upon the Parties, by other Parties”—thus
24 expressly excluding any third-party discovery requests. (Dkt. # 122 at 2.)

25 CONCLUSION

26 As the Parties only agreed to extend a few limited written discovery deadlines, and as the
27 Court certainly did not extend deadlines pertaining to third-party discovery, the Court should deny

1 Plaintiffs' Motion. Plaintiffs have known about Mr. Troyer's involvement for months before the
2 close of discovery and chose not to serve any third-party subpoenas at that time. Discovery is
3 closed, and closed it should remain.

4
5 DATED this 12th day of January, 2023.

6 Respectfully submitted,

7 s/ Andrew R. Stokesbary

8 Andrew R. Stokesbary, WSBA No. 46097
9 CHALMERS & ADAMS LLC
10 1003 Main Street, Suite 5
11 Sumner, WA 98390
12 T: (206) 207-3920
13 dstokesbary@chalmersadams.com

14 Jason B. Torchinsky (admitted pro hac vice)
15 Phillip M Gordon (admitted pro hac vice)
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17 HOLTZMAN VOGEL BARAN
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22 jtorchinsky@holtzmanvogel.com
23 pgordon@holtzmanvogel.com
24 apardue@holtzmanvogel.com

25 Dallin B. Holt (admitted pro hac vice)
26 Brennan A.R. Bowen (admitted pro hac vice)
27 HOLTZMAN VOGEL BARAN
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bbowen@holtzmanvogel.com

*Counsel for Intervenor-Defendants and
Cross-Plaintiffs*

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CERTIFICATE OF SERVICE

I hereby certify that on this day I electronically filed the foregoing document with the Clerk of the Court of the United States District Court for the Western District of Washington through the Court’s CM/ECF System, which will serve a copy of this document upon all counsel of record.

DATED this 12th day of January, 2023.

Respectfully submitted,
s/ Andrew R. Stokesbary
Andrew R. Stokesbary, WSBA No. 46097

*Counsel for Intervenor-Defendants and
Cross-Plaintiffs*

Subject: Re: Soto Palmer v. Hobbs - Discovery Responses
Date: Wednesday, December 28, 2022 at 6:36:46 PM Mountain Standard Time
From: Mark Gaber
To: Worthington, Kate S. (ATG), erica.franklin@atg.wa.gov, Dallin Holt, Sepe, Cristina (ATG), Aseem Mulji, Smith, Karl David (ATG), Sonni Waknin, andrew.hughes@atg.wa.gov
CC: Drew Stokesbary, Jason Torchinsky, Brennan Bowen, Ernest Herrera, Simone Leeper, Benjamin Phillips, chad@uclavrp.org, Deylin Thrift-Viveros, Bernadette Reyes, eddie@morfinlawfirm.com, Gwen Kelly, Phil Gordon, Sharon Norwood, Elizabeth Holcombe, Andrew Pardue
Attachments: image002.jpg, image003.jpg

Plaintiffs consent to the filing. Thank you for drafting.

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From: Worthington, Kate S. (ATG) <kate.worthington@atg.wa.gov>
Sent: Wednesday, December 28, 2022 7:24:40 PM
To: erica.franklin@atg.wa.gov <erica.franklin@atg.wa.gov>; 'Dallin Holt' <dholt@HoltzmanVogel.com>; Sepe, Cristina (ATG) <cristina.sepe@atg.wa.gov>; Aseem Mulji <amulji@campaignlegalcenter.org>; Smith, Karl David (ATG) <karl.smith@atg.wa.gov>; Sonni Waknin <sonni@uclavrp.org>; andrew.hughes@atg.wa.gov <andrew.hughes@atg.wa.gov>
Cc: Drew Stokesbary <dstokesbary@chalmersadams.com>; Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>; Brennan Bowen <bbowen@HoltzmanVogel.com>; Mark Gaber <MGaber@campaignlegalcenter.org>; Ernest Herrera <Eherrera@maldef.org>; Simone Leeper <SLeeper@campaignlegalcenter.org>; Benjamin Phillips <bphillips@campaignlegalcenter.org>; chad@uclavrp.org <chad@uclavrp.org>; Deylin Thrift-Viveros <dthrift-viveros@maldef.org>; Bernadette Reyes <bernadette@uclavrp.org>; eddie@morfinlawfirm.com <eddie@morfinlawfirm.com>; Gwen Kelly <gwen@uclavrp.org>; Phil Gordon <pgordon@HoltzmanVogel.com>; Brennan Bowen <bbowen@HoltzmanVogel.com>; Sharon Norwood <snorwood@HoltzmanVogel.com>; Elizabeth Holcombe <eholcombe@HoltzmanVogel.com>; Andrew Pardue <apardue@HoltzmanVogel.com>; Benjamin Phillips <bphillips@campaignlegalcenter.org>
Subject: RE: Soto Palmer v. Hobbs - Discovery Responses

The Secretary of State also consents to this filing, and we authorize you to use a digital signature. Please add my WSBA number (47556) to our signature block in the filing.

Best,

Kate

Kate S. Worthington | Assistant Attorney General
360.688.4467 | kate.worthington@atg.wa.gov

From: Franklin, Erica (ATG)
Sent: Wednesday, December 28, 2022 3:34 PM
To: 'Dallin Holt' <dholt@HoltzmanVogel.com>; Sepe, Cristina (ATG) <cristina.sepe@atg.wa.gov>; Aseem Mulji <amulji@campaignlegalcenter.org>; Smith, Karl David (ATG) <karl.smith@atg.wa.gov>; Sonni Waknin <sonni@uclavrp.org>; Hughes, Andrew (ATG) <andrew.hughes@atg.wa.gov>
Cc: Drew Stokesbary <dstokesbary@chalmersadams.com>; Jason Torchinsky

<jtorchinsky@HoltzmanVogel.com>; Brennan Bowen <bbowen@HoltzmanVogel.com>; Mark Gaber <MGaber@campaignlegalcenter.org>; Ernest Herrera <Eherrera@maldef.org>; Simone Leeper <sleeper@campaignlegalcenter.org>; Benjamin Phillips <BPhillips@campaignlegalcenter.org>; chad@uclavrp.org; Deylin Thrift-Viveros <dthrift-viveros@maldef.org>; Bernadette Reyes <bernadette@uclavrp.org>; eddie@morfinlawfirm.com; Gwen Kelly <gwen@uclavrp.org>; Phil Gordon <pgordon@HoltzmanVogel.com>; Worthington, Kate S. (ATG) <kate.worthington@atg.wa.gov>; Brennan Bowen <bbowen@HoltzmanVogel.com>; Sharon Norwood <snorwood@HoltzmanVogel.com>; Elizabeth Holcombe <eholcombe@HoltzmanVogel.com>; Andrew Pardue <apardue@HoltzmanVogel.com>; Benjamin Phillips <bphillips@campaignlegalcenter.org>

Subject: RE: Soto Palmer v. Hobbs - Discovery Responses

Dallin,

Thank you for your email. The State consents to this filing, and we authorize you to use a digital signature. Please use this version of our signature block:

s/ Cristina Sepe

ANDREW R. W. HUGHES, WSBA No. 49515

ERICA R. FRANKLIN, WSBA No. 43477

Assistant Attorneys General

800 Fifth Avenue, Suite 2000

Seattle, WA 98104

(206) 464-7744

andrew.hughes@atg.wa.gov

erica.franklin@atg.wa.gov

CRISTINA SEPE, WSBA No. 53609

Deputy Solicitor General

1125 Washington Street SE

PO Box 40100

Olympia, WA 98504-0100

(360) 753-6200

cristina.sepe@atg.wa.gov

Attorneys for Defendant/Cross-Defendant State of Washington

Best,

Erica

From: Dallin Holt <dholt@HoltzmanVogel.com>

Sent: Wednesday, December 28, 2022 1:46 PM

To: Sepe, Cristina (ATG) <cristina.sepe@atg.wa.gov>; Aseem Mulji <amulji@campaignlegalcenter.org>; Smith, Karl David (ATG) <karl.smith@atg.wa.gov>; Sonni Waknin <sonni@uclavrp.org>; Hughes, Andrew (ATG) <andrew.hughes@atg.wa.gov>

Cc: Drew Stokesbary <dstokesbary@chalmersadams.com>; Jason Torchinsky

<jtorchinsky@HoltzmanVogel.com>; Brennan Bowen <bbowen@HoltzmanVogel.com>; Mark Gaber

<MGaber@campaignlegalcenter.org>; Ernest Herrera <Eherrera@maldef.org>; Simone Leeper

<sleeper@campaignlegalcenter.org>; Benjamin Phillips <BPhillips@campaignlegalcenter.org>;

chad@uclavrp.org; Deylin Thrift-Viveros <dthrift-viveros@maldef.org>; Bernadette Reyes

<bernadette@uclavrp.org>; eddie@morfinlawfirm.com; Gwen Kelly <gwen@uclavrp.org>; Phil Gordon

<pgordon@HoltzmanVogel.com>; Franklin, Erica (ATG) <erica.franklin@atg.wa.gov>; Worthington, Kate S.

(ATG) <kate.worthington@atg.wa.gov>; Brennan Bowen <bbowen@HoltzmanVogel.com>; Sharon Norwood <snorwood@HoltzmanVogel.com>; Elizabeth Holcombe <eholcombe@HoltzmanVogel.com>; Andrew Pardue <apardue@HoltzmanVogel.com>; Benjamin Phillips <bphillips@campaignlegalcenter.org>

Subject: Re: Soto Palmer v. Hobbs - Discovery Responses

[EXTERNAL]

Counsel:

Please find attached a DRAFT stipulated motion to allow for limited out-of-time depositions, and extending presently pending written discovery responses until January 6, 2023, with any associated motions regarding the written discovery due by January 10, 2023.

We would like to file tomorrow. As such, if a representative for each party could respond and provide the okay to file (or any requested edits) by the end of the day today, it would be appreciated. Please also confirm the signature block is okay, and that each party is okay with us including a digital signature.

Thank you,

Dallin Holt

dholt@HoltzmanVogel.com // www.HoltzmanVogel.com



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This communication and any accompanying documents are confidential and privileged. They are intended for the sole use of the addressee. If you receive this transmission in error, you are advised that any disclosure, copying, distribution, or the taking of any action in reliance upon this communication is strictly prohibited. Moreover, any such disclosure shall not compromise or waive the attorney-client, accountant-client, or other privileges as to this communication or otherwise. If you have received this communication in error, please contact me at the above email address. Thank you.

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From: "Sepe, Cristina (ATG)" <cristina.sepe@atg.wa.gov>

Date: Friday, December 23, 2022 at 2:48 PM

To: Aseem Mulji <amulji@campaignlegalcenter.org>, "Smith, Karl David (ATG)" <karl.smith@atg.wa.gov>, Dallin Holt <dholt@HoltzmanVogel.com>, Sonni Waknin

<sonni@uclavrp.org>, "Hughes, Andrew (ATG)" <Andrew.Hughes@atg.wa.gov>

Cc: Drew Stokesbary <dstokesbary@chalmersadams.com>, Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>, Brennan Bowen <bbowen@HoltzmanVogel.com>, Mark Gaber <MGaber@campaignlegalcenter.org>, Ernest Herrera <eherrera@maldef.org>, Simone Leeper <sleeper@campaignlegalcenter.org>, Benjamin Phillips <BPhillips@campaignlegalcenter.org>, "chad@uclavrp.org" <chad@uclavrp.org>, Deylin Thrift-Viveros <dthrift-viveros@maldef.org>, Bernadette Reyes <bernadette@uclavrp.org>, "eddie@morfinlawfirm.com" <eddie@morfinlawfirm.com>, Gwen Kelly <gwen@uclavrp.org>, Phil Gordon <pgordon@HoltzmanVogel.com>, "Franklin, Erica (ATG)" <erica.franklin@atg.wa.gov>, "Worthington, Kate S. (ATG)" <kate.worthington@atg.wa.gov>, Brennan Bowen <bbowen@HoltzmanVogel.com>, Sharon Norwood <snorwood@HoltzmanVogel.com>, Elizabeth Holcombe <eholcombe@HoltzmanVogel.com>

Subject: RE: Soto Palmer v. Hobbs - Discovery Responses

Same with the State.

Thanks, all,

Cristina

From: Aseem Mulji <amulji@campaignlegalcenter.org>

Sent: Friday, December 23, 2022 11:52 AM

To: Smith, Karl David (ATG) <karl.smith@atg.wa.gov>; Dallin Holt <dholt@HoltzmanVogel.com>; Sonni Waknin <sonni@uclavrp.org>; Hughes, Andrew (ATG) <andrew.hughes@atg.wa.gov>

Cc: Drew Stokesbary <dstokesbary@chalmersadams.com>; Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>; Brennan Bowen <bbowen@HoltzmanVogel.com>; Mark Gaber <MGaber@campaignlegalcenter.org>; Ernest Herrera <eherrera@maldef.org>; Simone Leeper <SLeeper@campaignlegalcenter.org>; Benjamin Phillips <bphillips@campaignlegalcenter.org>; chad@uclavrp.org; Deylin Thrift-Viveros <Dthrift-viveros@maldef.org>; Bernadette Reyes <bernadette@uclavrp.org>; eddie@morfinlawfirm.com; Gwen Kelly <gwen@uclavrp.org>; Phil Gordon <pgordon@HoltzmanVogel.com>; Franklin, Erica (ATG) <erica.franklin@atg.wa.gov>; Sepe, Cristina (ATG) <cristina.sepe@atg.wa.gov>; Worthington, Kate S. (ATG) <kate.worthington@atg.wa.gov>; Brennan Bowen <bbowen@HoltzmanVogel.com>; Sharon Norwood <snorwood@HoltzmanVogel.com>; Elizabeth Holcombe <eholcombe@HoltzmanVogel.com>

Subject: RE: Soto Palmer v. Hobbs - Discovery Responses

[EXTERNAL]

Plaintiffs agree to extend the written discovery response deadline for all parties to January 6, 2023, and to extend the deadline to file motions regarding written discovery to January 10, 2023, as proposed by Intervenor.

Best,
Aseem

From: Smith, Karl David (ATG) <karl.smith@atg.wa.gov>
Sent: Thursday, December 22, 2022 4:42 PM
To: Dallin Holt <dholt@HoltzmanVogel.com>; Sonni Waknin <sonni@uclavrp.org>; andrew.hughes@atg.wa.gov
Cc: Drew Stokesbary <dstokesbary@chalmersadams.com>; Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>; Brennan Bowen <bbowen@HoltzmanVogel.com>; Mark Gaber <MGaber@campaignlegalcenter.org>; Ernest Herrera <eherrera@maldef.org>; Simone Leeper <SLeeper@campaignlegalcenter.org>; Aseem Mulji <amulji@campaignlegalcenter.org>; Benjamin Phillips <bphillips@campaignlegalcenter.org>; chad@uclavrp.org; Deylin Thrift-Viveros <Dthrift-viveros@maldef.org>; Bernadette Reyes <bernadette@uclavrp.org>; eddie@morfinlawfirm.com; Gwen Kelly <gwen@uclavrp.org>; Phil Gordon <pgordon@HoltzmanVogel.com>; erica.franklin@atg.wa.gov; Sepe, Cristina (ATG) <cristina.sepe@atg.wa.gov>; Worthington, Kate S. (ATG) <kate.worthington@atg.wa.gov>; Brennan Bowen <bbowen@HoltzmanVogel.com>; Sharon Norwood <snorwood@HoltzmanVogel.com>; Elizabeth Holcombe <eholcombe@HoltzmanVogel.com>
Subject: RE: Soto Palmer v. Hobbs - Discovery Responses

The Secretary of State welcomes the extension from the Plaintiffs and the Intervenors and has no objection to the brief extension requested by Intervenors.

Karl

Karl D. Smith
Deputy Solicitor General

Washington State Attorney General's Office
t 360.664.2510 f 360.664.2963
karl.smith@atg.wa.gov

From: Dallin Holt <dholt@HoltzmanVogel.com>
Sent: Thursday, December 22, 2022 7:16 AM
To: Sonni Waknin <sonni@uclavrp.org>; Hughes, Andrew (ATG) <andrew.hughes@atg.wa.gov>
Cc: Drew Stokesbary <dstokesbary@chalmersadams.com>; Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>; Brennan Bowen <bbowen@HoltzmanVogel.com>; cc: Mark Gaber <MGaber@campaignlegalcenter.org>; Ernest Herrera <eherrera@maldef.org>; Simone Leeper <SLeeper@campaignlegalcenter.org>; Aseem Mulji <amulji@campaignlegalcenter.org>; Benjamin Phillips <bphillips@campaignlegalcenter.org>; chad@uclavrp.org; Deylin Thrift-Viveros <Dthrift-viveros@maldef.org>; Bernadette Reyes <bernadette@uclavrp.org>; eddie@morfinlawfirm.com; Gwen Kelly <gwen@uclavrp.org>; Phil Gordon <pgordon@HoltzmanVogel.com>; Franklin, Erica (ATG) <erica.franklin@atg.wa.gov>; Sepe, Cristina (ATG) <cristina.sepe@atg.wa.gov>; Smith, Karl David (ATG) <karl.smith@atg.wa.gov>; Worthington, Kate S. (ATG) <kate.worthington@atg.wa.gov>; Brennan Bowen <bbowen@HoltzmanVogel.com>; Sharon Norwood <snorwood@HoltzmanVogel.com>; Elizabeth Holcombe <eholcombe@HoltzmanVogel.com>
Subject: Re: Soto Palmer v. Hobbs - Discovery Responses

[EXTERNAL]

Sonni and Andrew:

Intervenor-Defendants and Cross-Plaintiffs are also okay with extending discovery responses until January 6, 2023, provided that Plaintiffs provide us the same courtesy and extend all of Intervenor-Defendants' responses to pending ROGs, RFPs, and RFAs to January 6, 2023. Additionally, any agreement would also need to include all parties agreeing to extend any discovery-related motion practice (pertaining to written discovery) to allow filings up through January 10, 2023. Provided everyone is okay with that, we can draft a Motion (hopefully one that all parties can join in) requesting that the Court extend discovery deadlines pertaining to the agreed written discovery and depositions that the parties have already agreed to.

Thank you,

Dallin Holt

dholt@HoltzmanVogel.com // www.HoltzmanVogel.com



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Any accounting, business or tax advice contained in this communication, including attachments and enclosures, is not intended as a thorough, in-depth analysis of specific issues, nor a substitute for a formal opinion, nor is it sufficient to avoid tax-related penalties. If desired, Holtzman Vogel, PLLC would be pleased to perform the requisite research and provide you with a detailed written analysis. Such an engagement may be the subject of a separate engagement letter that would define the scope and limits of the desired consultation services.

From: Sonni Waknin <sonni@uclavrp.org>

Date: Wednesday, December 21, 2022 at 4:34 PM

To: "Hughes, Andrew (ATG)" <andrew.hughes@atg.wa.gov>

Cc: Drew Stokesbary <dstokesbary@chalmersadams.com>, Dallin Holt <dholt@HoltzmanVogel.com>, Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>, Brennan Bowen

<bbowen@HoltzmanVogel.com>, "cc: Mark Gaber" <MGaber@campaignlegalcenter.org>, Ernest Herrera <eherrera@maldef.org>, Simone Leeper <SLeeper@campaignlegalcenter.org>, Aseem Mulji

<amulji@campaignlegalcenter.org>, Benjamin Phillips <bphillips@campaignlegalcenter.org>,"

"chad@uclavrp.org" <chad@uclavrp.org>, Deylin Thrift-Viveros <Dthrift-viveros@maldef.org>,"

Bernadette Reyes <bernadette@uclavrp.org>, "eddie@morfinlawfirm.com"

<eddie@morfinlawfirm.com>, Gwen Kelly <gwen@uclavrp.org>, Phil Gordon

<pgordon@HoltzmanVogel.com>, "Franklin, Erica (ATG)" <erica.franklin@atg.wa.gov>, "Sepe, Cristina

(ATG)" <cristina.sepe@atg.wa.gov>, "Smith, Karl David (ATG)" <karl.smith@atg.wa.gov>, "Worthington, Kate S. (ATG)" <kate.worthington@atg.wa.gov>

Subject: Re: Soto Palmer v. Hobbs - Discovery Responses

Counsel,

Plaintiffs agree to extend all written discovery deadlines to Jan 6, 2023. Plaintiffs would also like to request that due dates for responses by Plaintiffs be extended to January 6th as well.

Sincerely,
Sonni Waknin

On Wed, Dec 21, 2022 at 2:30 PM Hughes, Andrew (ATG) <andrew.hughes@atg.wa.gov> wrote:

Counsel,

We have some discovery responses due to Plaintiffs and Intervenors on December 29, 30, and January 2. I understand that these due dates are largely driven by the discovery cut-off, but as you might imagine, the timing is less than ideal in light of the holidays and travel plans. Would the parties consent to extending all written discovery deadlines to January 6? Thanks.

Andrew

Andrew Hughes (he/him)
Section Chief
Complex Litigation Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
andrew.hughes@atg.wa.gov
Telephone: 206-498-8113

--

Sonni Waknin
Pronouns: She/Her/Hers
Program Manager of the Voting Rights Project and Voting Rights Counsel
UCLA Voting Rights Project