

Victoria Ashby (12248)
Robert H. Rees (4125)
Eric N. Weeks (7340)
Michael Curtis (15115)
OFFICE OF LEGISLATIVE RESEARCH AND GENERAL COUNSEL
Utah State Capitol Complex,
House Building, Suite W210
Salt Lake City, UT 84114-5210
Telephone: 801-538-1032
vashby@le.utah.gov
rrees@le.utah.gov
eweeks@le.utah.gov

Tyler R. Green (10660)
CONSOVOY MCCARTHY PLLC
222 S. Main Street, 5th Floor
Salt Lake City, UT 84101
(703) 243-9423
tyler@consovoymccarthy.com

Taylor A.R. Meehan (pro hac vice)
Frank H. Chang (pro hac vice)
CONSOVOY MCCARTHY PLLC
1600 Wilson Blvd. Suite 700
Arlington, VA 22209
(703) 243-9423
taylor@consovoymccarthy.com
frank@consovoymccarthy.com

Counsel for Legislative Defendants

**IN THE THIRD JUDICIAL DISTRICT COURT
IN AND FOR SALT LAKE COUNTY, STATE OF UTAH**

LEAGUE OF WOMEN VOTERS OF UTAH,
MORMON WOMEN FOR ETHICAL GOVERNMENT, STEFANIE CONDIE, MALCOLM REID, VICTORIA REID, WENDY MARTIN, ELEANOR SUNDWALL, JACK MARKMAN, and DALE COX,

Plaintiffs,

v.

UTAH STATE LEGISLATURE; UTAH LEGISLATIVE REDISTRICTING COMMITTEE; SENATOR SCOTT SANDALL, in his official capacity; REPRESENTATIVE BRAD WILSON, in his official capacity; SENATOR J. STUART ADAMS, in his official capacity; and LIEUTENANT GOVERNOR DEIDRE HENDERSON, in her official capacity,

Defendants.

REPLY IN SUPPORT OF LEGISLATIVE DEFENDANTS' MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT AND FIRST AMENDED COMPLAINT

(Expedited consideration requested)

Case No.: 220901712

Honorable Dianna Gibson

REPLY

Plaintiffs cannot contest that these remanded proceedings present novel issues of constitutional law not yet considered by the Court or the parties. As the Utah Supreme Court explained, it was pronouncing for the first time a new constitutional framework for Plaintiffs’ evolving claim under Article I, §2. *See League of Women Voters of Utah v. Utah State Legislature*, 2024 UT 21, ¶76. While the remanded proceedings are straightforward insofar as they are likely to turn on questions of law, Defendants are still entitled adequate time to respond to Plaintiffs’ dispositive motion and amended complaint. With no notice of Plaintiffs’ plans for “expedited” summary judgment proceedings, Defendants could not anticipate working around preexisting court deadlines and seek a modest and reasonable extension. There’s no inconsistency in seeking a modest extension to respond to a summary-judgment motion and the first amended complaint, while opposing the intervention of a late-comer who seeks discovery and not a decision.

CONCLUSION

The Court should grant Legislative Defendants’ motion and extend their deadlines to respond to Plaintiffs’ summary-judgment motion and first amended complaint to and including October 18, 2024.

Dated: September 4, 2024

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House Building, Suite W210
Salt Lake City, UT 84114-5210
Telephone: 801-538-1032
vashby@le.utah.gov
rrees@le.utah.gov
eweeks@le.utah.gov

Respectfully submitted,

/s/ Tyler R. Green
Tyler R. Green (10660)
CONSOVOY MCCARTHY PLLC
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Salt Lake City, UT 84101
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(703) 243-9423

Counsel for Legislative Defendants

CERTIFICATE OF SERVICE

I filed this brief on the Court's electronic filing system, which will email everyone requiring notice.

Dated: September 4, 2024

/s/ Tyler R. Green