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**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, and JACK MARKMAN,

Plaintiffs,

v.

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

Defendants.

**PLAINTIFFS' MOTION TO EXPEDITE  
CONSIDERATION OF MOTION FOR  
LEAVE TO FILE SECOND  
SUPPLEMENTAL COMPLAINT AND  
FOR MOTION FOR PRELIMINARY  
INJUNCTION ON COUNT 15 OF THEIR  
SECOND SUPPLEMENTAL  
COMPLAINT**

Case No. 220901712

Honorable Dianna Gibson

Plaintiffs respectfully request that this Court expedite its review of (1) Plaintiffs’ Motion for Leave to File Second Supplemental Complaint and (2) Plaintiffs’ Motion for a Preliminary Injunction on Count 15 of their Second Supplemental Complaint. This request is in addition to the Motion to Expedite submitted previously (Doc. 334) with regard to Plaintiffs’ Motion for Leave to File First Supplemental Complaint (Doc. 332) and Motion for a Preliminary Injunction (Doc. 333). All four Motions—two Motions to file supplemental complaints and two Motions for Preliminary Injunction—address exigent matters related to the upcoming election and ballot deadlines and should be granted.

The Utah Rules of Civil Procedure are to be construed liberally to “achieve the just, speedy, and inexpensive determination of every action.” Utah R. Civ. P. 1. In election-related cases where ballot deadlines are at issue, motions to expedite are routinely granted. *See e.g., League of Women Voters of Delaware, Inc. v. Dep’t of Elections*, 250 A.3d 922, 931 (Del. Ch.), *judgment entered sub nom. League of Women Voters of Delaware, Inc. v. State* (Del. Ch. 2020) (“Recognizing the exigency of this [ballot deadline and election] matter, I granted the Plaintiffs’ Motion to Expedite.”). For a just and speedy resolution in the case, the Court should expedite review.

In their accompanying Motion, Plaintiffs request a preliminary injunction enjoining Defendants from placing the proposed constitutional amendment (Amendment D) on the ballot or otherwise declaring the proposed Amendment void for failure to comply with the newspaper publication requirement of Article XXIII, Sec. 1. As explained in Plaintiffs’ previous Motion to Expedite, Doc. 333, the election is fast approaching, warranting expedited consideration.

Whether Plaintiffs’ motions for preliminary injunction are granted before or after the ballots have been printed, or before or after they are mailed, expedited review is still necessary. Expedited review will minimize the number of voters who receive ballots asking them to vote on

a constitutional amendment based on flagrantly inaccurate language and without the benefit of the constitutionally required newspaper publication which would have given voters the chance to read the full and accurate text of the proposed amendment. Furthermore, if Amendment D remains on the ballot for some or all voters, Plaintiffs are asking this Court to declare the amendment void because of the deceptive language used to describe it, and because the Legislature failed to comply with the plain language of the constitution's publication requirement. Expedited review proves necessary for any eventuality.

Plaintiffs likewise renew their request that the Court schedule a status conference as soon as possible to set a schedule for resolution of the already-pending motions as well as those filed with this Motion to Expedite. Plaintiffs otherwise propose that the court set a deadline of **September 12** for Defendants to respond to Plaintiffs' Motion for a Preliminary Injunction on Count 15 and **September 16** for Plaintiffs' reply, with a hearing on the motion as soon as possible thereafter.

The Legislature has attempted to place a proposed amendment on the ballot in a way that violates the Constitution. The fast-approaching election creates an exigent circumstance warranting expedited review of Plaintiffs' Motions for a Preliminary Injunction.

September 7, 2024

Respectfully submitted,

/s/ David C. Reymann

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*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

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

September 7, 2024

/s/ Kade N. Olsen