

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’  
NOTICE OF MOTION FOR STAY  
BASED ON CONSTRUCTIVE DENIAL**

Intervenor-Defendants respectfully provide notice that they intend to move for a stay pending appeal of this Court’s March 15 order in the Ninth Circuit on Monday, March 18. Intervenor-Defendants made an oral motion for such a stay at the hearing on February 9, 2024. Although this Court’s order today does not address that request specifically, Intervenor-Defendants view the order as constructively denying that request for stay pending appeal. If this Court intended to leave open that issue, Intervenor-Defendants request that this Court clarify that the motion remains pending.

1 DATED this 15th day of March, 2024.

2 Respectfully submitted,

3 s/ Andrew R. Stokesbary

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*Counsel for Intervenor-Defendants*

I certify that this memorandum contains 88 words, in compliance with the Local Civil Rules.

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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 15th day of March, 2024.

Respectfully submitted,  
  
s/ Andrew R. Stokesbary  
Andrew R. Stokesbary, WSBA No. 46097  
  
*Counsel for Intervenor-Defendants*