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SUPERIOR COURT OF ARIZONA

MOHAVE COUNTY

JEANNE KENTCH, et al.,

Plaintiffs/Contestants,

v.

KRIS MAYES,

Defendant/Contestee,

and

ADRIAN FONTES, et al.,

Defendants

No. S8015CV202201468

REPLY IN SUPPORT OF MOTION FOR ATTORNEYS' FEES

(Assigned to the Hon. Lee F. Jantzen)

In opposing Ms. Mayes's Motion for Attorneys' Fees, Plaintiffs perplexingly paint this case, "like *Bush v. Gore*," as "the sort of standard, run of the mill post-election litigation that went largely unremarked in close races prior to 2020." [Resp. at 3–4] But Plaintiffs don't stop there. They "brought and litigated this case," they explain (at 4), simply "to encourage confidence in Arizona's election results." Ms. Mayes, by comparison, is the one whose arguments have been "patently absurd," "baseless and hyperbolic," Plaintiffs continue (at 7).

Plaintiffs' positions are wrong. And they further evince Plaintiffs' refusal (or inability) to come to terms with the outcome of not only this election contest, but also the election that occurred over three months ago. Sanctions are warranted here.

First, sanctions are warranted because Plaintiffs unreasonably expanded and delayed this proceeding by forcing a trial on claims for which there was no evidence. Before trial began, Ms. Mayes invited Plaintiffs to dismiss claims that they appeared to have abandoned. Plaintiffs refused. But to the surprise of the parties (and, possibly, this Court), Plaintiffs then did not present even a single piece of evidence on those three claims. In their Response, we now learn that this surprise was no surprise at all. Plaintiffs intended to present no such evidence, they admit, because they had come up emptyhanded through their inspection of thousands of ballots. Forcing a trial on these groundless claims was unreasonable, and Plaintiffs therefore should pay, at a minimum, the fees that they forced Ms. Mayes to incur for trial.

Second, sanctions are warranted also because, as we now know, Plaintiffs brought this election contest without the evidence to support their claims. As Plaintiffs concede in their Response (at 6), they knew they lacked sufficient evidence "to meet their burden at trial"—unless that evidence was uncovered through discovery. That is the definition of a fishing expedition brought in bad faith. This contest was never about "encourag[ing] confidence in Arizona's election results," as Plaintiffs assure this Court. Rather, as expressed outside this

proceeding (*see infra* at 8–9), this contest was a vehicle for pushing Plaintiffs' and their counsel's unsubstantiated views that "[i]t is indisputable that [Mr. Hamadeh] received the most votes" and that "dirty lawyers" "hid[] votes to steal elections."

Sanctions are warranted here. And they are warranted to dispel any notion that this election contest is simply "the sort of standard, run of the mill post-election litigation." That, and that alone, will "encourage confidence in Arizona's election results," as Plaintiffs desire.

Argument

Under A.R.S. § 12-349(A)(1), (3), "the court shall assess reasonable attorney fees, expenses and, at the court's discretion, double damages of not to exceed five thousand dollars against an attorney or party . . . if the attorney or party" either: "[u]nreasonably expands or delays the proceeding," or "[b]rings . . . a claim without substantial justification." When either ground is shown by "a preponderance of the evidence," "the fee award is mandatory." *Phx. Newspapers, Inc. v. Ariz. Dep't of Corrs.*, 188 Ariz. 237, 243–44 (App. 1997). Both grounds exist here.

I. Plaintiffs "unreasonably expand[ed] or delay[ed] the proceeding."

As Ms. Mayes explains in her Motion (at 9–10), Plaintiffs "[u]nreasonably expand[ed] or delay[ed] the proceeding," A.R.S. § 12-349(A)(3), by forcing the parties and this Court to proceed through trial. Because Plaintiffs knew, before trial, that "[they] would not be able to meet their burden at trial"—as they concede in their Response (at 6)—they had an obligation not to force the parties and this Court through a dead-end trial. But Plaintiffs forged ahead.

On the morning of trial, Ms. Mayes's counsel asked Plaintiffs "to clarify" that "they have abandoned Counts 1 through 3 of their complaint and that they are only seeking to provide evidence of an erroneous count," i.e., of Count 4. [12/23/2022 Bench Trial Tr. ("Tr.") 17:20–24] In response, Plaintiffs not only refused to dismiss those counts, but even doubled down on them, stating: "We're not abandoning our—we're not abandoning those counts. We are—I would say

that we do not have further evidence to offer. . . . So yeah, I mean, that's a mischaracterization to say that we're abandoning any counts." [*Id.* 18:2–8] Then, to advance these claims they refused to dismiss—alleging disqualification of ballots (Count 1), denial of provisional ballots (Count 2), and ballot duplication errors (Count 3)—Plaintiffs offered only one witness and six contested ballots as evidence of entirely different conduct: undervotes, as alleged in Count 4. Plaintiffs did not offer any evidence to support Count 1, 2, or 3. And in their closing, Plaintiffs conceded that their evidence "won't actually be enough to sustain this particular contest." [*Id.* 112:11; *see also id.* 108:14–15 ("I think we did show some errors. They were obviously not substantial enough.")]

Because Plaintiffs knew at the start of trial that they lacked sufficient evidence for their claims—and were invited to dismiss them—Plaintiffs had an obligation "to dismiss claims . . . found not to be valid." A.R.S. § 12-350(2); *see Takieh v. O'Meara*, 252 Ariz. 51, 62–63 ¶¶ 41, 43 (App. 2021) (affirming an award of "attorneys' fees under A.R.S. § 12-349" where "[t]he superior court found that, in the end, [plaintiff] offered no admissible evidence [supporting his claim], made no 'effort to determine [facts relevant to this claim]' before filing his amended complaint, and failed 'to withdraw his claim' when confronted with his lack of evidence").

In their Response (at 6), Plaintiffs surprisingly admit they knew—even before the morning of trial—that "[they] would not be able to meet their burden at trial." Specifically, Plaintiffs concede (at 6, 12) two key points: (1) that, "[o]nce th[e] limited ballot inspection was complete, it was clear that . . . Plaintiffs would not be able to meet their burden at trial," and (2) that their election contest failed in part because they did not "obtain expedited discovery," including of "the cast vote record." In other words, Plaintiffs admit that they had *no evidence* to support their claims—unless it was uncovered through discovery. That is the very definition of a fishing expedition. *See Takieh*, 252 Ariz. at 62 ¶ 43 (awarding § 12-349 fees in part because

"[n]othing in the record suggests that [the plaintiff] had any admissible evidence to support his defamation claim . . . at the time he filed his amended complaint"); *see also* A.R.S. § 12-350(1). And based on this failed fishing expedition, Plaintiffs at a minimum had an obligation not to proceed further—an obligation they ignored. *See Standage v. Jaburg & Wilk, P.C.*, 177 Ariz. 221, 230 (App. 1993) ("[Counsel] had an obligation as an attorney to review and reevaluate his client's position as the facts of the case developed and—although he should have known at the outset that the claims were frivolous—if he did not know at the outset, as he became aware of information that should reasonably lead him to believe there was no factual or legal bases for his position, he was obligated to re-evaluate any earlier certification under Rule 11.").

Next, Plaintiffs curiously contend (at 6–7) that, after the ballot inspection proved fruitless, "[they] conferred and changed their entire trial strategy specifically to avoid unnecessarily delay [sic]," by (apparently) deciding both to not offer any evidence for Counts 1 through 3 and to offer only the six ballots and one witness for Count 4. Plaintiffs did so, they claim (at 8), "to minimize the burden on everyone" involved in this trial on Friday, December 23, before a holiday weekend. Because Plaintiffs knew they would offer *no* evidence for Counts 1 through 3 and legally insufficient evidence for Count 4, though, the only option was to "dismiss [those] claims . . . found not to be valid," A.R.S. § 12-350(c)—not to forge ahead. *See Standage*, 177 Ariz. at 230 (affirming sanctions where counsel "proceeded with complete disregard to whether the claim is well grounded").

For these reasons, Plaintiffs "[u]nreasonably expand[ed] or delay[ed] the proceeding." A.R.S. § 12-349(A)(3). This Court therefore should, at a minimum, award Ms. Mayes the fees and expenses she incurred for trial and preparation the day before trial. *See id.*

II. Plaintiffs brought their claims "without substantial justification."

Throughout this entire proceeding, Plaintiffs also prosecuted "a claim without substantial justification." A.R.S. § 12-349(A)(1). Under this statute, a claim lacks "substantial justification" when it is "groundless and is not made in good faith." A.R.S. § 12-349(F). A claim is groundless "'if the proponent can present no rational argument based upon the evidence or law in support of that claim.'" *Rogone v. Correia*, 236 Ariz. 43, 50 ¶ 22 (App. 2014) (citation omitted).

A. Plaintiffs' five claims were all groundless.

As Ms. Mayes explains in her Motion (at 6), Plaintiffs could "present no rational argument based upon the evidence or law in support of th[eir] claim[s]." *Id.* (citation omitted). These five claims centered on: (1) disqualification of ballots, (2) wrongful exclusion of provisional voters, (3) inaccurate ballot duplications, (4) improper ballot adjudications, and (5) unverified early ballots. [12/9/2022 Statement of Election Contest] Plaintiffs' Response does not address any claim individually. Doing so makes clear that they were groundless.

For Counts 1, 2, and 3, Plaintiffs presented no evidence, whatsoever, as Ms. Mayes argues in her Motion (at 6–7). Plaintiffs decline to even respond to this argument.[1]

For Count 4, relating to alleged undervotes, Plaintiffs claimed both "illegal votes" and an "erroneous count of votes." As to illegal votes—a claim Plaintiffs refused to dismiss before trial—Plaintiffs previously portrayed this claim as a typo or "drafting matter," "that was only a heading anyway" and "wasn't part of the body of the complaint." [Tr. 108:20–109:1; *see id.* 108: 23–24 ("But I mean, that's just the way it goes in these types of situations")] Still now, in their Response, Plaintiffs decline to defend this claim.

[1] Plaintiffs (at 10–12) dispute "[they] had *no* evidence," stating that "[they] reviewed over 2,000 complaints of Election Day irregularities, interviewed over 145 witnesses," and "reviewed numerous public record requests." But none of that is evidence in the record. And if Plaintiffs had wanted the Court to consider any of it, they could have presented it at trial. They did not.

As to Count 4's alleged erroneous count of undervotes, Plaintiffs' failed ballot inspection proved that this count was groundless, as established above. *See* Ariz. Attorney's Fees Manual § 5.4.3.1 ("[A] claim or defense may be considered groundless under A.R.S. § 12-349 once a party or counsel realizes, or should realize, that there is no *admissible* evidence to support a claim, even if there may be 'circumstantial' reasons for believing the claim to be true." (citing *Takieh*, 252 Ariz. at 62 ¶¶ 40–42)). The only evidence Plaintiffs offered was (1) the brief testimony of their ballot inspector for Maricopa County, and (2) six ballots that supposedly should have been cast for Mr. Hamadeh.[2] In no world would Plaintiffs' proffered evidence have been sufficient—as Plaintiffs conceded and this Court concluded. [*See* Tr. 112:8–13 (Plaintiffs conceding, "[These contested votes] won't actually be enough to sustain this particular contest[.]"); *id.* 115:25–116:9 (This Court concluding, "The bottom line is you [Plaintiffs] just haven't proven you[r] case. You haven't met the burden. . . . I would[n]'t even think there is even slight information that something was done illegally or incorrectly.")][3]

Plaintiffs do not even dispute that Count 5 was groundless. It was dismissed, as Ms. Mayes observes (at 8), based on clear Supreme Court precedent. Plaintiffs' claim was not a "debatable issue." *Ickes v. Bache Halsey Stuart Shields, Inc.*, 133 Ariz. 300, 303 (App. 1982).

For every claim above, Plaintiffs "'can present no rational argument based upon the evidence or law in support of that claim.'" *Rogone*, 236 Ariz. at 50 ¶ 22 (citation omitted). In their Response, in fact, Plaintiffs do not attempt to do so. These claims thus were "groundless." A.R.S. § 12-349(F).

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[2] The Maricopa County Elections Director, by comparison, testified that based on all contested ballots in evidence Ms. Mayes would have received a net gain of three votes. [Tr. 85:17–21]

[3] Plaintiffs (at 7) cast Ms. Mayes's argument as "misleading or false" because "Plaintiffs never conceded that their cause of action 'failed as a matter of law.'" But when a party "offer[s] insufficient evidence as a matter of law to support" a claim—as Plaintiffs concede—that claim fails "as a matter of law." *Scalia v. Green*, 229 Ariz. 100, 101 ¶ 1 (App. 2011).

B. None of Plaintiffs' arguments prove to the contrary.

Rather than defending their specific claims based on the evidence at trial, Plaintiffs lump together all five claims, arguing that none were groundless, for two reasons. Neither is correct.

First, Plaintiffs repeat (at 5 & 9 (citation omitted)) a distinguishable legal principle: "The mere fact that a party is ultimately unable to sustain its claims . . . does not automatically equate to a determination that the complaint itself was frivolous." True. But that is not the problem here. Plaintiffs were not just "ultimately unable to sustain [their] claims" (*id.*); as explained above, Plaintiffs lacked *any* evidence to support Count 1, 2, or 3, their evidence as to Count 4 was legally insufficient as a matter of law, and Supreme Court precedent foreclosed Count 5.

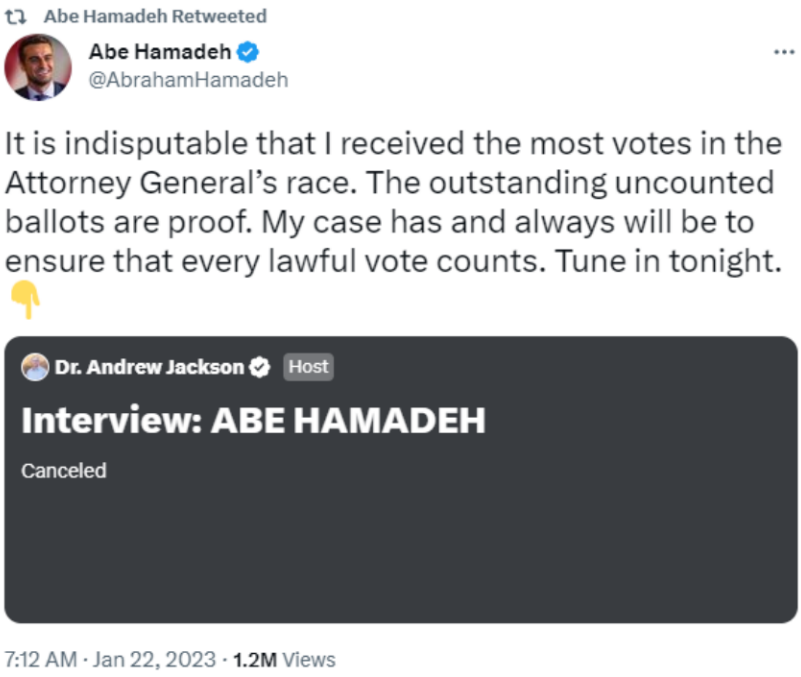
Second, Plaintiffs argue (at 9) that their claims were not groundless because their "contest alleged in part that the results of the December 5 canvass were erroneous" and the "results of the mandatory recount show they *were*." As a threshold matter, though, the recount results were announced *after* the trial and, thus, are immaterial to whether Plaintiffs' claims were groundless "at the time [Plaintiffs] filed [their] . . . complaint" or at the start of trial. *Takieh*, 252 Ariz. at 62 ¶ 43. Nor, in any event, do the recount results move the needle for Plaintiffs' claims. The results confirmed, again, that Ms. Mayes won the election; they would not establish, as Plaintiffs needed to show, that she "did not in fact receive the highest number of votes." A.R.S. § 16-672(A)(5).

C. Plaintiffs' claims were in "bad faith."

By continuing to pursue these groundless claims, Plaintiffs also prosecuted this case in "bad faith." A.R.S. § 12-350(5). As this Court knows, bad faith may be—and often is—based on "inference[s]" drawn from facts. *Harris v. Reserve Life Ins. Co.*, 158 Ariz. 380, 383 (App. 1988) (finding that the facts "support[ed] an inference of bad faith" under § 12-349). Plaintiffs thus are wrong in their argument (at 13) that bad faith cannot be based on "an insufficiently grounded complaint." *See Takieh*, 252 Ariz. at 63 ¶ 43 (upholding a finding of "bad faith" where

"[n]othing in the record suggests [the plaintiff] had any admissible evidence to support his defamation claim against [a defendant] at the time [the plaintiff] filed his amended complaint").

As Ms. Mayes also asserts in her Motion (at 8 (citation omitted)), Plaintiffs' bad faith is further evidenced by their multiple public statements criticizing the election as a "botched election." Since those statements, Plaintiffs and their counsel have doubled down (at least publicly) on their claims of a botched election and (now) misconduct in this Court's proceedings. Mr. Hamadeh still claims, for example, "It is indisputable that [he] received the most votes":



[Abe Hamadeh (@AbrahamHamadeh), Twitter (Jan. 22, 2023 7:12 AM), https://twitter.com/AbrahamHamadeh/status/1617163306216878081?s=20&t=uBikmInaywc3eEnsyFAAwQ] And Mr. Hamadeh and his (newest) counsel, Sigal Chattah, now allege that in this case the former Secretary of State and her counsel "hid[] votes to steal elections":

[Sigal Chattah (@Chattah4Nevada), Twitter (Jan. 25, 2023 8:10 AM), https://twitter.com/Chattah4Nevada/status/1618265123201875968?s=20&t=uBikmInaywc3eEnsyFAAwQ. *But see* Resp. at 4 ("Plaintiffs brought and litigated this case to encourage confidence in Arizona's election results."]

This is not good faith; nor is consistent with Plaintiffs' representations to this Court. [*See* Resp. at 4 ("As the Court acknowledged, and contrary to Defendants' claims, Plaintiffs have emphasized that this case is not and was not about impugning election officials or undermining confidence in Arizona's elections[] . . . . To the contrary, Plaintiffs . . . have deliberately refrained from making incendiary accusations about intentional misconduct in these proceedings.")]

In response, Plaintiffs fail to prove otherwise. They argue (at 15) that these public statements (1) "are of highly limited value" because they "were sent after the conclusion of this matter," (2) "were made outside of the judicial proceedings, where rhetoric is often more heated and less precise," (3) "represent the views of one Plaintiff"—Mr. Hamadeh—only, and (4) do not "suggest, let alone prove, that Plaintiff brought this election contest in bad faith."

These arguments all fail. In considering a sanctions motion, this Court of course may consider statements made after trial and outside the courthouse—and this evidence can be highly probative (as it is here). *See Takieh*, 252 Ariz. at 62–63 (affirming finding of bad faith based on party's later filings, affidavits, and representations). Moreover, to the extent Plaintiffs point the blame at Mr. Hamadeh only, all Plaintiffs and their counsel chose to not only challenge this election, but also proceed to trial when they knew they lacked evidence.

Plaintiffs next attempt to absolve themselves of any bad faith by highlighting a statement by counsel for Maricopa County, Joseph La Rue. Specifically, Plaintiffs repeatedly assert (at 6, 13, & 15) that "even counsel for Defendant Maricopa County acknowledged[] [that] Plaintiffs have acted in good faith." Mr. La Rue, however, did not say as much. He was, rather, responding to Mr. La Sota's statement—at the hearing on the ballot inspection, not at the trial—that, as to "the question of who's responsible for the fact that we have not had the inspection[,] I mean, I think we've worked in good faith." [12/22/2022 Emergency Hr'g Transcript 7:5–7] To which Mr. La Rue, in response, agreed that "Mr. La Sota has acted in good faith and Maricopa County has certainly acted in good faith, Mr. La Sota did not have the one offer that we could have done that would have provided him inspection of the ballots." [*Id.* 17:17–21] But Mr. La Rue's statement about the parties meeting and conferring on the *ballot inspection* does not equate to a concession that Plaintiffs acted in good faith in prosecuting their claims, as Plaintiffs contend.

For these reasons, Plaintiffs have prosecuted this action in bad faith. Because Plaintiffs' claims both were "groundless and [were] not made in good faith," Plaintiffs brought these "claim[s] without substantial justification." A.R.S. § 12-349(A)(1), (F). Therefore, "the fee award is mandatory." *Phx. Newspapers, Inc.*, 188 Ariz. at 243–44.[4]

[4] Plaintiffs also try to limit any forthcoming fees award, arguing (at 3): "Plaintiffs understand this Motion to refer to the proceedings that commenced with the filing of the Statement of Contest on December 9 and ended with an order from the bench on December 23,

Conclusion

The Court should grant Ms. Mayes's Motion for Attorneys' Fees, awarding her the attorneys' fees and expenses that she was forced to incur throughout this entire proceeding, as well as double damages of not to exceed $5,000. Alternatively, because Plaintiffs forced the parties and this Court to proceed through trial even when Plaintiffs knew after the ballot inspection that they lacked the evidence to succeed on their claims, this Court should award Ms. Mayes the fees and expenses she incurred for trial and preparation the day before trial, allow Ms. Mayes to file a fee application, and enter judgment immediately. And regardless of whether the ultimate fees award covers the entire proceeding or just the trial, the Court should enter this award against both Plaintiffs and their counsel, jointly and severally.[5]

2022." Not so. As Ms. Mayes asserts in her Response to Plaintiffs' Motion for a New Trial—filed after Ms. Mayes moved for attorneys' fees—"this Court should also award fees to Ms. Mayes for responding to [Plaintiffs'] Motion [for a New Trial], which Plaintiffs filed 'without substantial justification' and to '[u]nreasonably expand or delay the proceeding.'" [Resp. to Mot. for New Trial at 17 (third alteration in original) (quoting A.R.S. § 12-349(A)(1), (3))]

[5] Ms. Mayes acknowledges that, as to Plaintiffs' counsel, some have abandoned ship while others have recently jumped aboard. [*See* Resp. at 3 n.1 (detailing four of the six firms that have represented Plaintiffs)] Thus, to the extent the Court sanctions Plaintiffs' former or new counsel for their former or current involvement in this action, "[t]he court may allocate the payment of attorney fees among the offending attorneys and parties, jointly or severally, and may assess separate amounts against an offending attorney or party." A.R.S. § 12-349(B).

Dated: February 3, 2023.

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