

1 Timothy A. La Sota, Ariz. Bar No. 020539

2 **TIMOTHY A. LA SOTA, PLC**

3 2198 East Camelback Road, Suite 305

4 Phoenix, Arizona 85016

(602) 515-2649

5 tim@timlasota.com

6 *Attorney for Plaintiffs/Contestants*

7 Alexander Kolodin (030826)

8 Veronica Lucero (030292)

9 Arno Naeckel (026158)

10 James C. Sabalos (*pro hac vice*)

11 **Davillier Law Group, LLC**

12 4105 North 20th Street, Suite 110

13 Phoenix, Arizona 85016

14 T: (602) 730-2985

15 F: (602) 801-2539

16 akolodin@davillierlawgroup.com

17 vlucero@davillierlawgroup.com

18 anaeckel@davillierlawgroup.com

19 jsabalos@davillierlawgroup.com

20 phxadmin@davillierlawgroup.com

Jennifer J. Wright (027145)

JENNIFER WRIGHT ESQ., PLC

4350 E. Indian School Road Ste #21-105

Phoenix, Arizona 85018

T: (602) 842-3061

jen@jenwesq.com

Sigal Chattah Esq. (*pro hac vice*)

CHATTAH LAW GROUP

5875 S. Rainbow Blvd #204

Las Vegas, Nevada 89118

Tel: (702) 360-6200

Fax: (702) 643-6292

Chattahlaw@gmail.com

Attorneys for Plaintiff/Contestant Abraham Hamadeh

IN THE SUPERIOR COURT FOR THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MOHAVE

JEANNE KENTCH, an individual; TED BOYD,
an individual; ABRAHAM HAMADEH, an
individual; and REPUBLICAN NATIONAL
COMMITTEE, a federal political party committee

Plaintiffs/Contestants,

v.

KRIS MAYES,

Defendant/Contestee,

and

ADRIAN FONTES, *et al.*,

Defendants.

No. S8015CV202201468

**PLAINTIFFS' RESPONSE IN
OPPOSITION TO MOHAVE
COUNTY DEFENDANTS'
SUPPLEMENTAL JOINDER IN
NAVAJO COUNTY
DEFENDANTS' MOTION TO
COMPENSATE BALLOT
INSPECTORS**

(assigned to Hon. Lee F. Jantzen)

1 For the reasons delineated in Plaintiffs' Response in Opposition to Contestee Mayes
2 Joinder to Compensate Ballot Inspectors filed on January 30, 2023, Plaintiffs hereby object
3 to setting the compensation for ballot inspectors at rate at or equal to attorney's fees as
4 suggested by Mohave County Defendants' Supplemental Joinder in Navajo County
5 Defendants' Motion to Compensate Ballot Inspectors filed on April 19, 2023.

6 Plaintiffs reassert that the appropriate rate of compensation for all ballot inspectors
7 is at or around \$20 per hour, regardless who is ultimately "taxed as costs against the losing
8 party." A.R.S. § 16-677(C).

9 RESPECTFULLY SUBMITTED this 26th day of April, 2023.

10 By: /s/ Jennifer J. Wright

11 Jennifer J. Wright (027145)
12 **JENNIFER WRIGHT ESQ., PLC**
13 4350 E. Indian School Road Ste #21-105
14 Phoenix, AZ 85018

15 /s/ Alexander Kolodin (with permission)

16 Alexander Kolodin (030826)
17 Veronica Lucero (030292)
18 Arno Naeckel (026158)
19 James C. Sabalos (*pro hac vice*)
20 **Davillier Law Group, LLC**
21 4105 North 20th Street, Suite 110
22 Phoenix, AZ 85016

23 /s/ Sigal Chattah (with permission)

24 Sigal Chattah Esq. (*pro hac vice*)
25 **CHATTAH LAW GROUP**
26 5875 S. Rainbow Blvd #204
27 Las Vegas, Nevada 89118

28 *Attorneys for Plaintiff/Contestant Abraham Hamadeh*

/s/ Timothy La Sota (with permission)

Timothy A La Sota, SBN # 020539
TIMOTHY A. LA SOTA, PLC
2198 East Camelback Road, Suite 305
Phoenix, Arizona 85016

Attorney for Plaintiffs/Contestants

1 ORIGINAL efiled and served via electronic means
2 this 26th day of April, 2023, upon:

3 Honorable Lee F. Jantzen
4 Mohave County Superior Court c/o
5 Danielle Lecher
6 division4@mohavecourts.com

7 Craig Alan Morgan (AZ Bar No. 023373)
8 Shayna Stuart (AZ Bar No. 034819)
9 Jake T. Rapp (AZ Bar No. 036208)
10 LAW OFFICES SHERMAN & HOWARD L.L.C.
11 2555 East Camelback Road, Suite 1050
12 Phoenix, Arizona 85018
13 Telephone: (602) 240-3000
14 Fax: (602) 240-6600
15 CMorgan@ShermanHoward.com
16 SStuart@shermanhoward.com
17 JRapp@ShermanHoward.com

18 Maithreyi Ratakondan (*pro hac vice pending*)
19 STATES UNITED DEMOCRACY CENTER
20 1 Liberty Plaza
21 165 Broadway, 23rd Floor, Office 2330
22 New York, NY 10006
23 T: (202) 999-9305
24 mai@statesuniteddemocracy.org
25 *Attorneys for Defendant Secretary of State Adrian Fontes*

26 Paul F. Eckstein
27 Alexis E. Danneman
28 Matthew R. Koerner
Margo R. Casselman
Samantha J. Burke
Perkins Coie LLP
2901 North Central Avenue
Suite 2000
Phoenix, AZ 85012
peckstein@perkinscoie.com
adanneman@perkinscoie.com
mkoerner@perkinscoie.com
mcasselman@perkinscoie.com
sburke@perkinscoie.com
docketphx@perkinscoie.com
Attorneys for Defendant Kris Mayes

1 Thomas P. Liddy
2 Joseph J. Branco
3 Joseph E. LaRue
4 Karen J. Hartman-Tellez
5 Jack L. O'Connor III
6 Sean Moore
7 Rosa Aguilar
8 Maricopa County Attorney's Office
9 225 West Madison St.
10 Phoenix, AZ 85003
11 liddy@mcao.maricopa.gov
12 branco@mcao.maricopa.gov
13 larue@mcao.maricopa.gov
14 hartmank@mcao.maricopa.gov
15 oconnor@mcao.maricopa.gov
16 moore@mcao.maricopa.gov
17 aguilar@mcao.maricopa.gov

18 Emily Craiger
19 The Burgess Law Group
20 3131 East Camelback Road, Suite 224
21 Phoenix, Arizona 85016
22 Emily@theburgesslawgroup.com
23 *Attorneys for Defendant, Stephen Richer, Maricopa County Recorder,*
24 *And Maricopa County Board of Supervisors*

25 Celeste Robertson
26 Joseph Young
27 Apache County Attorney's Office
28 245 West 1st South
St. Johns, AZ 85936
crobertson@apachelaw.net
jyoung@apachelaw.net
Attorneys for Defendant, Larry Noble, Apache County Recorder,
and Apache County Board of Supervisors

Christine J. Roberts
Paul Correa
Cochise County Attorney's Office
Bisbee, AZ 85603
croberts@cochise.az.gov
pcorrea@cochise.az.gov
Attorneys for Defendant, David W. Stevens, Cochise County Recorder,
and Cochise County Board of Supervisors

1 Bill Ring
2 Coconino County Attorney's Office 110
3 East Cherry Avenue
4 Flagstaff, AZ 86001
5 wring@coconino.az.gov
6 *Attorney for Defendant, Patty Hansen, Coconino County Recorder,*
7 *and Coconino County Board of Supervisors*

8 Jeff Dalton
9 Gila County Attorney's Office 1400
10 East Ash Street
11 Globe, AZ 85551
12 jdalton@gilacountyaz.gov
13 *Attorney for Defendant, Sadie Jo Bingham, Gila County Recorder,*
14 *and Gila County Board of Supervisors*

15 Jean Roof
16 Graham County Attorney's Office
17 800 West Main Street
18 Safford, AZ 85546
19 jroof@graham.az.gov
20 *Attorneys for Defendant, Polly Merriman, Graham County Recorder,*
21 *and Graham County Board of Supervisors*

22 Scott Adams
23 Greenlee County Attorney's Office
24 P.O. Box 1717
25 Clifton, AZ 85533
26 sadams@greenlee.az.gov
27 *Attorney for Defendant, Sharie Milheiro, Greenlee County Recorder,*
28 *and Greenlee County Board of Supervisors*

29 Ryan N. Dooley
30 La Paz County Attorney's Office
31 1320 Kofa Avenue
32 Parker, AZ 85344
33 rdooley@lapazcountyaz.org
34 *Attorney for Defendant, Richard Garcia, La Paz County Recorder,*
35 *and La Paz County Board of Supervisors*

1 Ryan Esplin
2 William Davis
3 Mohave County Attorney's Office Civil Division
4 P.O. Box 7000
5 Kingman, AZ 86402-7000
6 esplir@mohave.gov
7 davisw@mohave.gov
8 caocivil.court@mohave.gov
9 *Attorney for Defendant, Kristi Blair, Mohave County Recorder,*
10 *and Mohave County Board of Supervisors*

11 Jason Moore
12 Navajo County Attorney's Office
13 P.O. Box 668
14 Holbrook, AZ 86025-0668
15 jason.moore@navajocountyaz.gov
16 *Attorney for Defendant, Michael Sample, Navajo County Recorder,*
17 *and Navajo County Board of Supervisors*

18 Daniel Jurkowitz
19 Ellen Brown
20 Javier Gherna
21 Pima County Attorney's Office
22 32 N. Stone #2100
23 Tucson, AZ 85701
24 Daniel.Jurkowitz@pcao.pima.gov
25 Ellen.Brown@pcao.pima.gov
26 Javier.Gherna@pcao.pima.gov
27 *Attorney for Gabriela Cázares-Kelley, Pima County Recorder,*
28 *and Pima County Board of Supervisors*

29 Craig Cameron
30 Scott Johnson
31 Allen Quist
32 Jim Mitchell
33 Pinal County Attorney's Office
34 30 North Florence Street
35 Florence, AZ 85132
36 craig.cameron@pinal.gov
37 scott.m.johnson@pinal.gov
38 allen.quist@pinal.gov
39 james.mitchell@pinal.gov
40 *Attorneys for Defendant, Dana Lewis, Pinal County Recorder,*
41 *and Pinal County Board of Supervisors*

1 Robert F. May
2 Kimberly Hunley
3 Santa Cruz County Attorney's Office
4 2150 North Congress Drive, Suite 201
5 Nogales, AZ 85621-1090
6 khunley@santacruzcountyaz.gov
7 *Attorneys for Defendant, Suzanne Sainz, Santa Cruz County Recorder,*
8 *and Santa Cruz County Board of Supervisors*

9 Thomas M. Stoxen
10 Michael J. Gordon
11 Yavapai County Attorney's Office
12 255 East Gurley Street, 3rd Floor
13 Prescott, AZ 86301
14 Thomas.Stoxen@yavapaiaz.gov
15 Michael.Gordon@yavapaiaz.gov
16 *Attorney for Defendant, Michelle M. Burchill, Yavapai County Recorder,*
17 *and Yavapai County Board of Supervisors*

18 Bill Kerekes
19 Yuma County Attorney's Office
20 198 South Main Street
21 Yuma, AZ 85364
22 bill.kerekes@yumacountyaz.gov
23 *Attorney for Defendant, Richard Colwell, Yuma County Recorder,*
24 *and Yuma County Board of Supervisors*

25 /s/ Jennifer J. Wright
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28