

**FILED**

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STATE OF MINNESOTA  
SPECIAL REDISTRICTING PANEL

April 29, 2022

OFFICE OF  
APPELLATE COURTS

A21-0243  
A21-0546

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Peter S. Wattson, Joseph Mansky, Nancy B. Greenwood, Mary E. Kupper, Douglas W. Backstrom and James E. Hougas III, individually and on behalf of all citizens and voting residents of Minnesota similarly situated, and League of Women Voters Minnesota,

Plaintiffs,

and

Paul Anderson, Ida Lano, Chuck Brusven, Karen Lane, Joel Hineman, Carol Wegner, and Daniel Schonhardt,

Plaintiff-Intervenors

**WATTSON PLAINTIFFS’  
NOTICE OF MOTION AND MOTION  
FOR ATTORNEYS’ FEES, COSTS,  
AND DISBURSEMENTS**

vs.

Steve Simon, Secretary of State of Minnesota; and Kendra Olson, Carver County Elections and Licensing Manager, individually and on behalf of all Minnesota county chief election officers,

Defendants,

and

Frank Sachs, Dagny Heimisdottir, Michael Arulfo, Tanwi Prigge, Jennifer Guertin, Garrison O’Keith McMurtrey, Mara Lee Glubka, Jeffrey Strand, Danielle Main, and Wayne Grimmer,

Plaintiffs,

**ORAL ARGUMENT REQUESTED**

and

Dr. Bruce Corrie, Shelly Diaz, Alberder  
Gillespie, Xiongpaoo Lee, Abdirazak  
Mahboub, Aida Simon, Beatriz Winters,  
Common Cause, OneMinnesota.org, and  
Voices for Racial Justice,

Plaintiff-Intervenors,

vs.

Steve Simon, Secretary of State of  
Minnesota,

Defendant.

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TO: Defendant Steve Simon, Secretary of State of Minnesota, through his Attorneys  
Angela Behrens and Nathan J. Hartshorn, Minnesota Attorney General's Office, 445  
Minnesota Street, Suite 1400, St. Paul, MN 55101.

Defendant Kendra Olson, Carver County Elections and Licensing Manager, through her  
Attorney Jennifer Tichey, Carver County Attorney, 604 E. 4<sup>th</sup> Street, Chaska, MN 55318.

Plaintiff-Intervenors Paul Anderson, Ida Lano, Chuck Brusven, Karen Lane, Joel Hineman,  
Carol Wegner, and Daniel Schonhardt, through their attorneys Elizabeth M. Brama, Maren  
M. Forde, and Samuel N. Louwagie, Taft Stettinius & Hollister LLP, 2200 IDS Center, 80  
S 8<sup>th</sup> Street, Minneapolis, MN 55402.

Plaintiffs Frank Sachs, Dagny Heimisdottir, Michael Arulfo, Tanwi Prigge, Jennifer  
Guertin, Garrison O'Keith McMurtrey, Mara Lee Glubka, Jeffrey Strand, Danielle Main,  
and Wayne Grimmer, through their attorneys Charles N. Nauen, David J. Zoll, Kristen G.  
Marttila and Rachel A. Kitze Collins, Lockridge, Grindal Nauen P.L.L.P., 100 Washington  
Avenue South, Suite 2200, Minneapolis, MN 55401.

Plaintiff-Intervenors Dr. Bruce Corrie, Shelly Diaz, Alberder Gillespie, Xiongpaoo Lee,  
Abdirazak Mahboub, Aida Simon, Beatriz Winters, Common Cause, OneMinnesota.org,  
and Voices for Racial Justice, through their attorneys Brian A. Dillon and Amy Erickson,  
Lathrom GPM, LLP, 80 S Eighth Street, 500 IDS Center, Minneapolis, MN 55402.

**NOTICE**

**PLEASE TAKE NOTICE**, that on \_\_\_\_\_, 2022, Plaintiffs Peter S. Wattson, Joseph Mansky, Nancy B. Greenwood, Mary E. Kupper, Douglas W. Backstrom and James E. Hougas III, individually and on behalf of all citizens and voting residents of Minnesota similarly situated, and League of Women Voters Minnesota (“Wattson Plaintiffs”) in the above-captioned matter, through their undersigned counsel, will move the Minnesota Special Redistricting Panel for the relief requested below.

**MOTION**

Pursuant to 42 U.S.C. § 1988(b), Plaintiffs Peter S. Wattson, Joseph Mansky, Nancy B. Greenwood, Mary E. Kupper, Douglas W. Backstrom and James E. Hougas III, individually and on behalf of all citizens and voting residents of Minnesota similarly situated, and League of Women Voters Minnesota (the “Wattson Plaintiffs”) hereby move the Special Redistricting Panel for an award of their reasonable attorneys’ fees, costs, and disbursements. The Wattson Plaintiffs request that the Panel order that the Defendant Secretary of State Mark Ritchie and Defendant Carver County Elections and Licensing Manager Kendra Olson (the “Defendants”) pay their fully compensatory fee of \$305,360.12 in attorneys’ fees, costs and disbursements that are directly related to this judicial redistricting litigation brought under Section 1983 of the Civil Rights Act, 42 U.S.C. § 1983.

The Wattson Plaintiffs’ Motion for Attorney’s Fees, Costs, and Disbursements is

based upon the Memorandum in support of the Wattson Plaintiffs' Motion for Attorney's Fees, Costs, and Disbursements, the Affidavits of James H. Gilbert and Adam L. Sienkowski and supporting documentation attached thereto, and all of the files, records, and proceedings herein. The Wattson Plaintiffs request oral argument on this motion.

Respectfully Submitted,

Date: April 29, 2022

JAMES H. GILBERT LAW GROUP, P.L.L.C.

By: /s/ Adam L. Sienkowski

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Attorneys for Petitioners Peter S. Wattson,

Joseph Mansky, Nancy B. Greenwood,

Mary E. Kupper, Douglas W. Backstrom,

and James E. Hougas III and League of

Women Voters Minnesota

**ACKNOWLEDGEMENT REQUIRED UNDER MINN. STAT. § 549.211, SUBD. 1**

The undersigned hereby acknowledges that sanctions may be imposed under Minn. Stat. § 549.211, if factual contentions and legal arguments contained in this pleading are unwarranted or presented for an improper purpose or are lacking in evidentiary support.

Date: April 29, 2022

/s/ Adam L. Sienkowski

Adam L. Sienkowski (#395659)