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| 8 9 | Facsimile: 602.798.5595 HerreraR@ballardspahr.com ArellanoD@ballardspahr.com | | | |
| 10 | Attorneys for the Arizona Democratic Party | | | |
| 11 | [additional counsel listed on signature page] | | | |
| 12 | ARIZONA SUP | PERIOR COURT | | |
| 13 | | F MARICOPA | | |
| 14 | | | | |
| 15 | LAURIE AGUILERA, et al., | Case No. CV2020-014562 | | |
| 16 | Plaintiffs, | [PROPOSED ANSWER] TO | | |
| 17 18 | vs. | PLAINTIFF'S COMPLAINT | | |
| 10 | ADRIAN FONTES, et al | Expedited Election Matter Hon | | |
| 20 | Defendants. | 110II | | |
| 21 | | | | |
| 22 | Intervenor-Defendant Arizona Democra | atic Party ("Intervenor-Defendant"), through its | | |
| 23 | undersigned counsel, answers the Verified Complaint filed by Plaintiffs the Laurie Aguilera and | | | |
| 24 | Donovan Drobina ("Plaintiffs") as follows: | | | |
| 25 | 1. Intervenor-Defendant lacks suf | ficient information to confirm or deny the | | |
| 26 | allegations in Paragraph 1.1 and therefore denies | the same. | | |
| 27 | 2. Intervenor-Defendant lacks suf | ficient information to confirm or deny the | | |
| 28 | allegations in Paragraph 1.2 and therefore denies | the same. | | |
| | | | | |

| 2 | The ellegations in Demograph 1.2 and a characterization of Disintiff's serves of action | | | | |
|---|--|--|--|--|--|
| 5. | The allegations in Paragraph 1.3 are a characterization of Plaintiff's cause of action | | | | |
| and legal contentions and conclusions, to which no response is required. To the extent a response | | | | | |
| is required, In | tervenor-Defendant denies the allegations in Paragraph 1.3. | | | | |
| 4. | The allegations in Paragraph 1.4 are a characterization of Plaintiff's cause of action | | | | |
| and legal cont | tentions and conclusions, to which no response is required. To the extent a response | | | | |
| is required, In | tervenor-Defendant denies the allegations in Paragraph 1.4. | | | | |
| | SECTION II - PARTIES, JURISDICTION, AND VENUE | | | | |
| 5. | Intervenor-Defendant lacks sufficient information to confirm or deny the | | | | |
| allegations in | Paragraph 2.1 and therefore denies the same. | | | | |
| | | | | | |
| | Intervenor-Defendant lacks sufficient information to confirm or deny the | | | | |
| allegations in | Paragraph 2.2 and therefore denies the same. | | | | |
| 7. | Intervenor-Defendant lacks sufficient information to confirm or deny the | | | | |
| allegations in | Paragraph 2.3 and therefore denies the same. | | | | |
| 8. | Intervenor-Defendant lacks sufficient information to confirm or deny the | | | | |
| allegations in | Paragraph 2.4 and therefore denies the same. | | | | |
| 9. | The allegations in Paragraph 2.5 state legal conclusions for which no response is | | | | |
| required. | | | | | |
| 10. | Intervenor-Defendant admits the allegations in paragraph 2.6. | | | | |
| | Intervenor-Defendant admits the allegations in paragraph 2.7. | | | | |
| | | | | | |
| | Intervenor-Defendant admits the allegations in paragraph 2.8. | | | | |
| | Intervenor-Defendant lacks sufficient information to confirm or deny the | | | | |
| allegations in | Paragraph 2.9 and therefore denies the same. | | | | |
| 14. | The allegations in Paragraph 2.10 state legal conclusions for which no response is | | | | |
| required. | | | | | |
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| | is required, In 4. and legal cont is required, In 5. allegations in 6. allegations in 7. allegations in 8. allegations in 9. required. 10. 11. 12. 13. allegations in 14. | | | | |

| 1 | 15. | The allegations in Paragraph 2.11 state legal conclusions for which no response is |
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| 2 | required. | |
| 3 | 16. | The allegations in Paragraph 2.12 state legal conclusions for which no response is |
| 4 | required. | |
| 5 | | SECTION III - FACTS |
| 6 7 | 17. | Intervenor-Defendant hereby incorporates its response to previous allegations. |
| 8 | 18. | The allegations in Paragraph 3.2 state legal conclusions for which no response is |
| 9 | required. | |
| 10 | 19. | The allegations in Paragraph 3.3 state legal conclusions for which no response is |
| 11 | required. | |
| 12 | 20. | The allegations in Paragraph 3.4 state legal conclusions for which no response is |
| 13 | | The anegations in Faragraph 3.4 state legal conclusions for which no response is |
| 14 | required. | |
| 15 | 21. | The allegations in Paragraph 3.5 state legal conclusions for which no response is |
| 16 | required. | |
| 17 | 22. | The allegations in Paragraph 3.6 are a characterization of Plaintiff's cause of action |
| 18 | and legal con | tentions and conclusions, to which no response is required. To the extent a response |
| 19 | is required, In | tervenor-Defendant denies the allegations in Paragraph 3.6. |
| 20 | 23. | The allegations in Paragraph 3.7 are a characterization of Plaintiff's cause of action |
| 21 22 | and legal con | tentions and conclusions, to which no response is required. To the extent a response |
| 23 | is required, In | tervenor-Defendant denies the allegations in Paragraph 3.7. |
| 24 | 24. | Intervenor-Defendant lacks sufficient information to confirm or deny the |
| 25 | allegations in | Paragraph 3.8 and therefore denies the same. |
| 26 | 25. | Intervenor-Defendant lacks sufficient information to confirm or deny the |
| 27 | allegations in | Paragraph 3.9 and therefore denies the same. |
| 28 | | |
| | | 2 |

| 1 | 26. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
|----------|--|--------------------------|----------|--------------|-------------|----|---------|----|------|-----|
| 2 | allegations in Paragraph 3.10 and therefore denies the same. | | | | | | | | | |
| 3 | 27. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
| 4 | allegations ir | n Paragraph 3.11 and the | refore d | enies the sa | ime. | | | | | |
| 5 6 | 28. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
| 7 | allegations ir | n Paragraph 3.12 and the | refore d | enies the sa | ime. | | | | | |
| 8 | 29. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
| 9 | allegations ir | n Paragraph 3.13 and the | refore d | enies the sa | ime. | | | | | |
| 10 | 30. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
| 11 | allegations ir | n Paragraph 3.14 and the | refore d | enies the sa | ime. | | | | | |
| 12 | 31. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
| 13 14 | allegations ir | n Paragraph 3.15 and the | refore d | enies the sa | ime. | | | | | |
| 14 | 32. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
| 16 | allegations ir | n Paragraph 3.16 and the | refore d | enies the sa | ime. | | | | | |
| 17 | 33. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
| 18 | allegations ir | n Paragraph 3.17 and the | refore d | enies the sa | ime. | | | | | |
| 19 | 34. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
| 20 | allegations ir | Paragraph 3.18 and the | refore d | enies the sa | ime. | | | | | |
| 21 22 | 35. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
| 22 | allegations ir | n Paragraph 3.19 and the | refore d | enies the sa | ime. | | | | | |
| 24 | 36. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
| 25 | allegations ir | n Paragraph 3.20 and the | refore d | enies the sa | ime. | | | | | |
| 26 | 37. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
| 27 | allegations ir | n Paragraph 3.21 and the | | | | | | | - | |
| 28 | | ~ . | | | | | | | | |
| | | | | -4- | | | | | | |
| | | | | | | | | | | |

| 2 allegations in Paragraph 3.22 and therefore denies the same. 3 39. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.23 and therefore denies the same. 4 40. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.24 and therefore denies the same. 8 41. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.25 and therefore denies the same. 10 42. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.26 and therefore denies the same. 11 allegations in Paragraph 3.27 and therefore denies the same. 12 43. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.27 and therefore denies the same. 14 allegations in Paragraph 3.28 and therefore denies the same. 15 44. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.29 and therefore denies the same. 16 allegations in Paragraph 3.29 and therefore denies the same. 17 46. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.30 and therefore denies the same. 18 allegations in Paragraph 3.30 and therefore denies the same. 18 allegations in Paragraph 3.31 and therefore denies the same. 19 | 1 | 38. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
|--|----|----------------|--------------------------|---------|--------------|-------------|----|---------|----|------|-----|
| 39. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.23 and therefore denies the same. 40. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.24 and therefore denies the same. 41. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.25 and therefore denies the same. 42. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.26 and therefore denies the same. 43. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.27 and therefore denies the same. 44. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.27 and therefore denies the same. 44. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.29 and therefore denies the same. 45. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.29 and therefore denies the same. 46. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.30 and therefore denies the same. 47. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.31 and therefore denies the same. 48. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.32 and therefore denies the same. 48. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.32 and therefore denies the same. 49. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.32 and therefore denies the same. 49. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.33 and therefore denie | 2 | allegations ir | Paragraph 3.22 and the | efore d | enies the sa | ime. | | | | | |
| allegations in Paragraph 3.23 and therefore denies the same. 40. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.24 and therefore denies the same. 8 41. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.25 and therefore denies the same. 10 42. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.26 and therefore denies the same. 12 43. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.27 and therefore denies the same. 14 44. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.28 and therefore denies the same. 16 allegations in Paragraph 3.29 and therefore denies the same. 17 45. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.29 and therefore denies the same. 18 allegations in Paragraph 3.30 and therefore denies the same. 18 allegations in Paragraph 3.31 and therefore denies the same. 19 46. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.31 and therefore denies the same. 21 47. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.32 and therefore denies the same. 23 48. Intervenor-Defendant lacks sufficient information to confi | 3 | 39. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
| 640. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.24 and therefore denies the same.841. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.25 and therefore denies the same.1042. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.26 and therefore denies the same.1243. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.27 and therefore denies the same.14allegations in Paragraph 3.27 and therefore denies the same.1544. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.28 and therefore denies the same.1745. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.29 and therefore denies the same.1846. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.30 and therefore denies the same.1247. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.31 and therefore denies the same.1348. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.32 and therefore denies the same.1449. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.31 and therefore denies the same.1449. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.33 and therefore denies the same.1549. Intervenor-Defendant lacks sufficient information to confi | | allegations ir | n Paragraph 3.23 and the | efore d | enies the sa | ime. | | | | | |
| 7allegations in Paragraph 3.24 and therefore denies the same.841. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.25 and therefore denies the same.1042. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.26 and therefore denies the same.1243. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.27 and therefore denies the same.14allegations in Paragraph 3.27 and therefore denies the same.1544. Intervenor-Defendant lacks sufficient information to confirm or deny th allegations in Paragraph 3.28 and therefore denies the same.16allegations in Paragraph 3.29 and therefore denies the same.1745. Intervenor-Defendant lacks sufficient information to confirm or deny th allegations in Paragraph 3.20 and therefore denies the same.1841. Intervenor-Defendant lacks sufficient information to confirm or deny th allegations in Paragraph 3.30 and therefore denies the same.1047. Intervenor-Defendant lacks sufficient information to confirm or deny th allegations in Paragraph 3.31 and therefore denies the same.1248. Intervenor-Defendant lacks sufficient information to confirm or deny th allegations in Paragraph 3.32 and therefore denies the same.1448. Intervenor-Defendant lacks sufficient information to confirm or deny th allegations in Paragraph 3.32 and therefore denies the same.1449. Intervenor-Defendant lacks sufficient information to confirm or deny th allegations in Paragraph 3.33 and therefore denies the same.1549. Intervenor-Defendant lacks sufficient information to conf | | 40. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
| 9 allegations in Paragraph 3.25 and therefore denies the same. 10 42. Intervenor-Defendant lacks sufficient information to confirm or deny th 11 allegations in Paragraph 3.26 and therefore denies the same. 12 43. Intervenor-Defendant lacks sufficient information to confirm or deny th 13 allegations in Paragraph 3.27 and therefore denies the same. 14 allegations in Paragraph 3.27 and therefore denies the same. 15 44. Intervenor-Defendant lacks sufficient information to confirm or deny th 16 allegations in Paragraph 3.28 and therefore denies the same. 17 45. Intervenor-Defendant lacks sufficient information to confirm or deny th 18 allegations in Paragraph 3.29 and therefore denies the same. 19 46. Intervenor-Defendant lacks sufficient information to confirm or deny th 11 allegations in Paragraph 3.30 and therefore denies the same. 12 47. Intervenor-Defendant lacks sufficient information to confirm or deny th 18 allegations in Paragraph 3.31 and therefore denies the same. 14 48. Intervenor-Defendant lacks sufficient information to confirm or deny th 13 allegations in Paragraph 3.32 and therefore denies the same. 14 49. Intervenor-Defendant lacks sufficient information to confirm or deny th | | allegations ir | n Paragraph 3.24 and the | efore d | enies the sa | ime. | | | | | |
| 1042. Intervenor-Defendant lacks sufficient information to confirm or deny th11allegations in Paragraph 3.26 and therefore denies the same.1243. Intervenor-Defendant lacks sufficient information to confirm or deny th13allegations in Paragraph 3.27 and therefore denies the same.14allegations in Paragraph 3.27 and therefore denies the same.1544. Intervenor-Defendant lacks sufficient information to confirm or deny th16allegations in Paragraph 3.28 and therefore denies the same.1745. Intervenor-Defendant lacks sufficient information to confirm or deny th18allegations in Paragraph 3.29 and therefore denies the same.1946. Intervenor-Defendant lacks sufficient information to confirm or deny th21allegations in Paragraph 3.30 and therefore denies the same.2247. Intervenor-Defendant lacks sufficient information to confirm or deny th23allegations in Paragraph 3.31 and therefore denies the same.2448. Intervenor-Defendant lacks sufficient information to confirm or deny th23allegations in Paragraph 3.32 and therefore denies the same.2448. Intervenor-Defendant lacks sufficient information to confirm or deny th25allegations in Paragraph 3.32 and therefore denies the same.2649. Intervenor-Defendant lacks sufficient information to confirm or deny th27allegations in Paragraph 3.33 and therefore denies the same. | 8 | 41. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
| 42. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.26 and therefore denies the same. 43. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.27 and therefore denies the same. 44. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.28 and therefore denies the same. 45. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.29 and therefore denies the same. 46. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.30 and therefore denies the same. 47. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.31 and therefore denies the same. 48. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.32 and therefore denies the same. 48. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.32 and therefore denies the same. 49. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.33 and therefore denies the same. | 9 | allegations ir | n Paragraph 3.25 and the | efore d | enies the sa | me. | | | | | |
| 1243. Intervenor-Defendant lacks sufficient information to confirm or deny th13allegations in Paragraph 3.27 and therefore denies the same.14allegations in Paragraph 3.27 and therefore denies the same.1544. Intervenor-Defendant lacks sufficient information to confirm or deny th16allegations in Paragraph 3.28 and therefore denies the same.1745. Intervenor-Defendant lacks sufficient information to confirm or deny th18allegations in Paragraph 3.29 and therefore denies the same.1946. Intervenor-Defendant lacks sufficient information to confirm or deny th20allegations in Paragraph 3.30 and therefore denies the same.2147. Intervenor-Defendant lacks sufficient information to confirm or deny th23allegations in Paragraph 3.31 and therefore denies the same.2448. Intervenor-Defendant lacks sufficient information to confirm or deny th25allegations in Paragraph 3.32 and therefore denies the same.2649. Intervenor-Defendant lacks sufficient information to confirm or deny th27allegations in Paragraph 3.33 and therefore denies the same. | 10 | 42. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
| 1343. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.27 and therefore denies the same.1544. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.28 and therefore denies the same.16allegations in Paragraph 3.28 and therefore denies the same.1745. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.29 and therefore denies the same.18allegations in Paragraph 3.29 and therefore denies the same.1946. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.30 and therefore denies the same.2147. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.31 and therefore denies the same.23allegations in Paragraph 3.32 and therefore denies the same.2448. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.32 and therefore denies the same.2649. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.33 and therefore denies the same. | 11 | allegations ir | n Paragraph 3.26 and the | efore d | enies the sa | me. | | | | | |
| 14allegations in Paragraph 3.27 and therefore denies the same.1544. Intervenor-Defendant lacks sufficient information to confirm or deny the16allegations in Paragraph 3.28 and therefore denies the same.1745. Intervenor-Defendant lacks sufficient information to confirm or deny the18allegations in Paragraph 3.29 and therefore denies the same.1946. Intervenor-Defendant lacks sufficient information to confirm or deny the20allegations in Paragraph 3.30 and therefore denies the same.2147. Intervenor-Defendant lacks sufficient information to confirm or deny the23allegations in Paragraph 3.31 and therefore denies the same.2448. Intervenor-Defendant lacks sufficient information to confirm or deny the25allegations in Paragraph 3.32 and therefore denies the same.2649. Intervenor-Defendant lacks sufficient information to confirm or deny the27allegations in Paragraph 3.33 and therefore denies the same. | | 43. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
| 1544.Intervenor-Defendantlackssufficientinformationtoconfirmordenyth16allegations in Paragraph 3.28 and therefore denies the same.1745.Intervenor-Defendantlackssufficientinformationtoconfirmordenyth18allegations in Paragraph 3.29 and therefore denies the same.1946.Intervenor-Defendantlackssufficientinformationtoconfirmordenyth20allegations in Paragraph 3.30 and therefore denies the same.2147.Intervenor-Defendantlackssufficientinformationtoconfirmordenyth23allegations in Paragraph 3.31 and therefore denies the same.2448.Intervenor-Defendantlackssufficientinformationtoconfirmordenyth25allegations in Paragraph 3.32 and therefore denies the same.2649.Intervenor-Defendantlackssufficientinformationtoconfirmordenyth27allegations in Paragraph 3.33 and therefore denies the same. | | allegations ir | n Paragraph 3.27 and the | efore d | enies the sa | ime. | | | | | |
| allegations in Paragraph 3.28 and therefore denies the same. 45. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.29 and therefore denies the same. 46. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.30 and therefore denies the same. 47. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.31 and therefore denies the same. 48. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.32 and therefore denies the same. 49. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.33 and therefore denies the same. | | 44. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
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| 46. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.30 and therefore denies the same. 47. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.31 and therefore denies the same. 48. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.32 and therefore denies the same. 49. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.33 and therefore denies the same. | 18 | allegations ir | Paragraph 3.29 and the | efore d | enies the sa | ime. | | | | | |
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| allegations in Paragraph 3.31 and therefore denies the same. 48. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.32 and therefore denies the same. 49. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.33 and therefore denies the same. | | 47. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
| 48. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.32 and therefore denies the same. 49. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.33 and therefore denies the same. | | allegations ir | n Paragraph 3.31 and the | efore d | enies the sa | ime. | | | | | |
| 26 27 49. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 3.33 and therefore denies the same. | | 48. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
| 27 allegations in Paragraph 3.33 and therefore denies the same. | 25 | allegations ir | n Paragraph 3.32 and the | efore d | enies the sa | me. | | | | | |
| 27 allegations in Paragraph 3.33 and therefore denies the same. | 26 | 49. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
| | 27 | allegations ir | | | | | | | | · | |
| | 28 | | | | | | | | | | |
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| 1 | 50. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
|----------|---|--------------------------|---------|---------------|----------------|-------|------------|------|---------|-------|
| 2 | allegations ir | Paragraph 3.34 and the | efore d | lenies the sa | me. | | | | | |
| 3 | 51. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
| 4 | allegations ir | Paragraph 3.35 and the | efore d | enies the sa | ime. | | | | | |
| 5 | 52. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
| 6 7 | allegations ir | 1 Paragraph 3.36 and the | efore d | lenies the sa | me. | | | | | |
| 8 | 53. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
| 9 | allegations ir | n Paragraph 3.37 and the | efore d | enies the sa | me. | | | | | |
| 10 | 54. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
| 11 | allegations ir | n Paragraph 3.38 and the | | | | | | | · | |
| 12 | 55. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
| 13 | allegations ir | n Paragraph 3.39 and the | | | | | | | | |
| 14 15 | 56. | Intervenor-Defendant | | | | to | confirm | or | denv | the |
| 15 | allegations ir | n Paragraph 3.40 and the | | | | | | | | |
| 17 | 57. | Intervenor-Defendant | | | | to | confirm | or | deny | the |
| 18 | allegations ir | n Paragraph 3.41 and the | | | | | | | 5 | |
| 19 | | | | | OF ACTION | | | | | |
| 20 | 58. | Intervenor-Defendant l | | | | to p | revious al | lega | tions. | |
| 21 | | | • | - | - | •• P | | 8 | | |
| 22 | FIRST CAUSE OF ACTION (Compliance of Electronic Voting System) | | | | | | | | | |
| 23 | 59. | The allegations in Par | U | | | | for which | no 1 | respons | se is |
| 24 25 | required. | | -9p | | -Bar | | | | -spons | • 15 |
| 26 | 60. | The allegations in Par | aoranh | 43 state le | egal conclusio | ns f | for which | no 1 | resnons | e is |
| 27 | required. | The unegations in I al | սելսիլլ | r.J state R | Sar conclusio | 113 1 | | 101 | cspons | 10 |
| 28 | | | | | | | | | | |
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61. The allegations in Paragraph 4.4 state legal conclusions for which no response is 1 2 required. 3 62. The allegations in Paragraph 4.5 are a characterization of Plaintiff's cause of action 4 and legal contentions and conclusions, to which no response is required. To the extent a response 5 is required, Intervenor-Defendant denies the allegations in Paragraph 4.5. 6 63. Intervenor-Defendant lacks sufficient information to confirm or deny the 7 allegations in Paragraph 4.6 and therefore denies the same. 8 9 64. The allegations in Paragraph 4.7 are a characterization of Plaintiff's cause of action 10 and legal contentions and conclusions, to which no response is required. To the extent a response 11 is required, Intervenor-Defendant denies the allegations in Paragraph 4.7. 12 65. The allegations in Paragraph 4.8 are a characterization of Plaintiff's cause of action 13 and legal contentions and conclusions, to which no response is required. To the extent a response 14 is required, Intervenor-Defendant denies the allegations in Paragraph 4.8. 15 16 66. The unnumbered Paragraph following Paragraph 4.8 in the Complaint constitutes 17 Plaintiffs' prayer for relief for their first claim to which no response is required. To the extent a 18 response is required, Intervenor-Defendant denies the allegations in Plaintiffs' prayer for relief, 19 and therefore denies that Plaintiffs are entitled to any relief in this case. 20 SECOND CAUSE OF ACTION 21 (Correctness, Impartiality, and Uniformity of Election Procedures) 22 67. The allegations in Paragraph 4.9 are a characterization of Plaintiff's cause of action 23 24 and legal contentions and conclusions, to which no response is required. To the extent a response 25 is required, Intervenor-Defendant denies the allegations in Paragraph 4.9. 26 68. The allegations in Paragraph 4.10 state legal conclusions for which no response is 27 required. 28 -7-

| 1 | 69. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
|----------|---|-----------------------------|---------|--------------|-------------|-------|------------|-------|---------|-------|
| 2 | allegations in | Paragraph 4.11 and then | efore d | enies the sa | ime. | | | | | |
| 3 | 70. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
| 4 | allegations in | Paragraph 4.12 and then | efore d | enies the sa | ime. | | | | | |
| 5 6 | 71. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
| 7 | allegations in | Paragraph 4.13 and then | efore d | enies the sa | ime. | | | | | |
| 8 | 72. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
| 9 | allegations in | Paragraph 4.15 and the | efore d | enies the sa | ime. | | | | | |
| 10 | 73. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
| 11 | allegations in | Paragraph 4.16 and then | efore d | enies the sa | ime. | | | | | |
| 12 | 74. | Intervenor-Defendant | lacks | sufficient | information | to | confirm | or | deny | the |
| 13 | allegations in | Paragraph 4.17 and then | efore d | enies the sa | ime. | | | | | |
| 14 15 | 75. | Intervenor-Defendant | | | | to | confirm | or | deny | the |
| 15 | allegations in | Paragraph 4.18 and the | efore d | enies the sa | ime. | | | | · | |
| 17 | 76. | Intervenor-Defendant | | | | to | confirm | or | denv | the |
| 18 | | Paragraph 4.19 and the | | | | | | | 5 | |
| 19 | 77. | The allegations in Pa | | | | atior | n of Plain | tiff' | s cause | e of |
| 20 | | gal contentions and con | 0 1 | | | | | | | |
| 21 | | quired, Intervenor-Defe | | | - | | • | | | iit u |
| 22 | 78. | The unnumbered Para | | | C | U | • | | constit | |
| 23 | | | | - | | | - | | | |
| 24 25 | | yer for relief for their se | | | - | | - | | | |
| 26 | response is required, Intervenor-Defendant denies the allegations in Plaintiffs' prayer for relief, | | | | | | | ner, | | |
| 27 | and therefore | denies that Plaintiffs are | | · | | 2. | | | | |
| 28 | | IH | IIKD CA | AUSE OF A | ICTION | | | | | |
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| 1 | (Ariz. Const. Art. II, § 21) |
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| 2 | 79. The allegations in Paragraph 4.21 state legal conclusions for which no response is |
| 3 | required. |
| 4 | 80. The allegations in Paragraph 4.22 are a characterization of Plaintiff's cause of |
| 5 | action and legal contentions and conclusions, to which no response is required. To the extent a |
| 6 7 | response is required, Intervenor-Defendant denies the allegations in Paragraph 4.22. |
| 8 | 81. The allegations in Paragraph 4.23 are a characterization of Plaintiff's cause of |
| 9 | action and legal contentions and conclusions, to which no response is required. To the extent a |
| 10 | |
| 11 | response is required, Intervenor-Defendant denies the allegations in Paragraph 4.23. |
| 12 | 82. The allegations in Paragraph 4.24 state legal conclusions for which no response is |
| 13 | required. |
| 14 | 83. The allegations in Paragraph 4.25 are a characterization of Plaintiff's cause of |
| 15 | action and legal contentions and conclusions, to which no response is required. |
| 16 | 84. Intervenor-Defendant lacks sufficient information to confirm or deny the |
| 17 | allegations in Paragraph 4.26 and therefore denies the same. |
| 18 | 85. The allegations in Paragraph 4.27 are a characterization of Plaintiff's cause of |
| 19 | action and legal contentions and conclusions, to which no response is required. To the extent a |
| 20 | response is required, Intervenor-Defendant denies the allegations in Paragraph 4.27. |
| 21 22 | 86. The allegations in Paragraph 4.28 are a characterization of Plaintiff's cause of |
| 22 | action and legal contentions and conclusions, to which no response is required. To the extent a |
| 24 | response is required, Intervenor-Defendant denies the allegations in Paragraph 4.28. |
| 25 | 87. The allegations in Paragraph 4.29 are a characterization of Plaintiff's cause of |
| 26 | action and legal contentions and conclusions, to which no response is required. To the extent a |
| 27 | response is required, Intervenor-Defendant denies the allegations in Paragraph 4.29. |
| 28 | response is required, intervenor-Derendant demes the anegations in Falagraph 4.27. |
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| 1 | 29. The ellegations in Demograph 4.20 and a characterization of Disintiff's cause of |
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| 1 | 88. The allegations in Paragraph 4.30 are a characterization of Plaintiff's cause of |
| 2 | action and legal contentions and conclusions, to which no response is required. To the extent a |
| 3 | response is required, Intervenor-Defendant denies the allegations in Paragraph 4.30. |
| 4 | 89. The unnumbered Paragraphs following Paragraph 4.30 in the Complaint constitutes |
| 5 6 | Plaintiffs' prayer for relief for their third claim to which no response is required. To the extent a |
| 7 | response is required, Intervenor-Defendant denies the allegations in Plaintiffs' prayer for relief, |
| 8 | and therefore denies that Plaintiffs are entitled to any relief in this case. |
| 9 | FOURTH CAUSE OF ACTION |
| 10 | (Ariz. Const. Art. II, § 13) |
| 11 | 90. The allegations in Paragraph 4.31 state legal conclusions for which no response is |
| 12 | required. |
| 13 | |
| 14 | 91. The allegations in Paragraph 4.32 are a characterization of Plaintiff's cause of |
| 15 | action and legal contentions and conclusions, to which no response is required. To the extent a |
| 16 | response is required, Intervenor-Defendant denies the allegations in Paragraph 4.32. |
| 17 | 92. The allegations in Paragraph 4.33 are a characterization of Plaintiff's cause of |
| 18 | action and legal contentions and conclusions, to which no response is required. To the extent a |
| 19 | response is required, Intervenor-Defendant denies the allegations in Paragraph 4.33. |
| 20 21 | 93. The unnumbered Paragraphs following Paragraph 4.33 in the Complaint constitutes |
| 21 22 | Plaintiffs' prayer for relief for their fourth claim to which no response is required. To the extent a |
| 23 | response is required, Intervenor-Defendant denies the allegations in Plaintiffs' prayer for relief, |
| 24 | and therefore denies that Plaintiffs are entitled to any relief in this case. |
| 25 | FIFTH CAUSE OF ACTION |
| 26 | (Election Procedures Manual) |
| 27 | |
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| 1 | 94. The allegations in Paragraph 4.34 state legal conclusions for which no response is | | | |
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| 2 | required. | | | |
| 3 | 95. The allegations in Paragraph 4.35 state legal conclusions for which no response is | | | |
| 4 | required. | | | |
| 5 6 | 96. Intervenor-Defendant lacks sufficient information to confirm or deny the | | | |
| 7 | allegations in Paragraph 4.36 and therefore denies the same. | | | |
| 8 | 97. Intervenor-Defendant lacks sufficient information to confirm or deny the | | | |
| 9 | allegations in Paragraph 4.37 and therefore denies the same. | | | |
| 10 | 98. The allegations in Paragraph 4.38 state legal conclusions for which no response is | | | |
| 11 | required. | | | |
| 12 | 99. Intervenor-Defendant lacks sufficient information to confirm or deny the | | | |
| 13 | | | | |
| 14 | allegations in Paragraph 4.39 and therefore denies the same. | | | |
| 15 | 100. The allegations in Paragraph 4.40 are a characterization of Plaintiff's cause of | | | |
| 16 | action and legal contentions and conclusions, to which no response is required. To the extent a | | | |
| 17 | response is required, Intervenor-Defendant denies the allegations in Paragraph 4.40. | | | |
| 18 | 101. The unnumbered Paragraph following Paragraph 4.40 in the Complaint constitutes | | | |
| 19 20 | Plaintiffs' prayer for relief for their fifth claim to which no response is required. To the extent a | | | |
| 20 | response is required, Intervenor-Defendant denies the allegations in Plaintiffs' prayer for relief, | | | |
| 22 | and therefore denies that Plaintiffs are entitled to any relief in this case. | | | |
| 23 | FIFTH CAUSE OF ACTION | | | |
| 24 | (Election Procedures Manual) | | | |
| 25 | 102. Intervenor-Defendant admits the allegations in paragraph 4.41. | | | |
| 26 | 103. The allegations in Paragraph 4.42 state legal conclusions for which no response is | | | |
| 27 | required. | | | |
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| 1 | 104. | The allegations in Paragraph 4.43 are a characterization of Plaintiff's cause of |
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| 2 | action and le | gal contentions and conclusions, to which no response is required. To the extent a |
| 3 | response is re | quired, Intervenor-Defendant denies the allegations in Paragraph 4.43. |
| 4 | 105. | The unnumbered Paragraphs following Paragraph 4.43 in the Complaint constitutes |
| 5 6 | Plaintiffs' pra | ayer for relief for their fifth claim to which no response is required. To the extent a |
| 7 | response is re | equired, Intervenor-Defendant denies the allegations in Plaintiffs' prayer for relief, |
| 8 | and therefore | denies that Plaintiffs are entitled to any relief in this case. |
| 9 | | AFFIRMATIVE DEFENSES |
| 10 | 106. | Plaintiffs have failed to show that any of Defendants' actions or omissions deprive |
| 11 | them of any p | protected constitutional or statutory right. |
| 12 | 107. | Plaintiffs fail to state a claim upon which relief can be granted. |
| 13 14 | 108. | Plaintiff's claim is barred by the doctrine of laches. |
| 14 | 109. | Intervenor-Defendant designates all denials to the Complaint set forth above as |
| 16 | defenses to th | e extent necessary for its full defense of this matter. |
| 17 | 110. | Intervenor-Defendant reserves the right to raise additional affirmative defenses as |
| 18 | those become | known and available in this action. |
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| 1 | DATED: November 15, 2020 | |
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| 3 | | |
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| 19 | | - |
| 20 | | *Pro hac vice application to be filed |
| 21 | | Attorneys for the Arizona Democratic Party |
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