

1 Sarah R. Gonski (Bar No. 032567)
2 **PERKINS COIE LLP**
3 2901 North Central Avenue, Suite 2000
4 Phoenix, Arizona 85012-2788
5 Telephone: 602.351.8000
6 Facsimile: 602.648.7000
7 SGonski@perkinscoie.com

8 Roy Herrera (Bar No. 032901)
9 Daniel A. Arellano (Bar No. 032304)
10 **BALLARD SPAHR LLP**
11 1 East Washington Street, Suite 2300
12 Phoenix, Arizona 85004-2555
13 Telephone: 602.798.5400
14 Facsimile: 602.798.5595
15 HerreraR@ballardspahr.com
16 ArellanoD@ballardspahr.com

17 *Attorneys for the Arizona Democratic Party*

18 [additional counsel listed on signature page]

19
20
21
22
23
24
25
26
27
28

ARIZONA SUPERIOR COURT
COUNTY OF MARICOPA

LAURIE AGUILERA, et al.,
Plaintiffs,
vs.
ADRIAN FONTES, et al..
Defendants.

Case No. CV2020-014562

**[PROPOSED ANSWER] TO
PLAINTIFF'S COMPLAINT**

Expedited Election Matter

Hon. _____

Intervenor-Defendant Arizona Democratic Party (“Intervenor-Defendant”), through its undersigned counsel, answers the Verified Complaint filed by Plaintiffs the Laurie Aguilera and Donovan Drobina (“Plaintiffs”) as follows:

1. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 1.1 and therefore denies the same.

2. Intervenor-Defendant lacks sufficient information to confirm or deny the allegations in Paragraph 1.2 and therefore denies the same.

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 in Paragraph 3.11 and therefore denies the same.

5 28. Intervenor-Defendant lacks sufficient information to confirm or deny the
6 allegations in Paragraph 3.12 and therefore denies the same.

7 29. Intervenor-Defendant lacks sufficient information to confirm or deny the
8 allegations in Paragraph 3.13 and therefore denies the same.

9 30. Intervenor-Defendant lacks sufficient information to confirm or deny the
10 allegations in Paragraph 3.14 and therefore denies the same.

11 31. Intervenor-Defendant lacks sufficient information to confirm or deny the
12 allegations in Paragraph 3.15 and therefore denies the same.

13 32. Intervenor-Defendant lacks sufficient information to confirm or deny the
14 allegations in Paragraph 3.16 and therefore denies the same.

15 33. Intervenor-Defendant lacks sufficient information to confirm or deny the
16 allegations in Paragraph 3.17 and therefore denies the same.

17 34. Intervenor-Defendant lacks sufficient information to confirm or deny the
18 allegations in Paragraph 3.18 and therefore denies the same.

19 35. Intervenor-Defendant lacks sufficient information to confirm or deny the
20 allegations in Paragraph 3.19 and therefore denies the same.

21 36. Intervenor-Defendant lacks sufficient information to confirm or deny the
22 allegations in Paragraph 3.20 and therefore denies the same.

23 37. Intervenor-Defendant lacks sufficient information to confirm or deny the
24 allegations in Paragraph 3.21 and therefore denies the same.
25
26
27
28

1 38. Intervenor-Defendant lacks sufficient information to confirm or deny the
2 allegations in Paragraph 3.22 and therefore denies the same.

3 39. Intervenor-Defendant lacks sufficient information to confirm or deny the
4 allegations in Paragraph 3.23 and therefore denies the same.

5 40. Intervenor-Defendant lacks sufficient information to confirm or deny the
6 allegations in Paragraph 3.24 and therefore denies the same.

7 41. Intervenor-Defendant lacks sufficient information to confirm or deny the
8 allegations in Paragraph 3.25 and therefore denies the same.

9 42. Intervenor-Defendant lacks sufficient information to confirm or deny the
10 allegations in Paragraph 3.26 and therefore denies the same.

11 43. Intervenor-Defendant lacks sufficient information to confirm or deny the
12 allegations in Paragraph 3.27 and therefore denies the same.

13 44. Intervenor-Defendant lacks sufficient information to confirm or deny the
14 allegations in Paragraph 3.28 and therefore denies the same.

15 45. Intervenor-Defendant lacks sufficient information to confirm or deny the
16 allegations in Paragraph 3.29 and therefore denies the same.

17 46. Intervenor-Defendant lacks sufficient information to confirm or deny the
18 allegations in Paragraph 3.30 and therefore denies the same.

19 47. Intervenor-Defendant lacks sufficient information to confirm or deny the
20 allegations in Paragraph 3.31 and therefore denies the same.

21 48. Intervenor-Defendant lacks sufficient information to confirm or deny the
22 allegations in Paragraph 3.32 and therefore denies the same.

23 49. Intervenor-Defendant lacks sufficient information to confirm or deny the
24 allegations in Paragraph 3.33 and therefore denies the same.

25
26
27
28

1 69. Intervenor-Defendant lacks sufficient information to confirm or deny the
2 allegations in Paragraph 4.11 and therefore denies the same.

3 70. Intervenor-Defendant lacks sufficient information to confirm or deny the
4 allegations in Paragraph 4.12 and therefore denies the same.

5 71. Intervenor-Defendant lacks sufficient information to confirm or deny the
6 allegations in Paragraph 4.13 and therefore denies the same.

7 72. Intervenor-Defendant lacks sufficient information to confirm or deny the
8 allegations in Paragraph 4.15 and therefore denies the same.

9 73. Intervenor-Defendant lacks sufficient information to confirm or deny the
10 allegations in Paragraph 4.16 and therefore denies the same.

11 74. Intervenor-Defendant lacks sufficient information to confirm or deny the
12 allegations in Paragraph 4.17 and therefore denies the same.

13 75. Intervenor-Defendant lacks sufficient information to confirm or deny the
14 allegations in Paragraph 4.18 and therefore denies the same.

15 76. Intervenor-Defendant lacks sufficient information to confirm or deny the
16 allegations in Paragraph 4.19 and therefore denies the same.

17 77. The allegations in Paragraph 4.20 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 4.20.

20 78. The unnumbered Paragraph following Paragraph 4.20 in the Complaint constitutes
21 Plaintiffs' prayer for relief for their second claim to which no response is required. To the extent a
22 response is required, Intervenor-Defendant denies the allegations in Plaintiffs' prayer for relief,
23 and therefore denies that Plaintiffs are entitled to any relief in this case.

24
25
26
27
28
THIRD CAUSE OF ACTION

1
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 response is required, Intervenor-Defendant denies the allegations in Paragraph 4.22.

7 81. The allegations in Paragraph 4.23 are a characterization of Plaintiff's cause of
8 action and legal contentions and conclusions, to which no response is required. To the extent a
9 response is required, Intervenor-Defendant denies the allegations in Paragraph 4.23.

10 82. The allegations in Paragraph 4.24 state legal conclusions for which no response is
11 required.
12

13 83. The allegations in Paragraph 4.25 are a characterization of Plaintiff's cause of
14 action and legal contentions and conclusions, to which no response is required.
15

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 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
23 response is required, Intervenor-Defendant denies the allegations in Paragraph 4.28.

24 87. The allegations in Paragraph 4.29 are a characterization of Plaintiff's cause of
25 action and legal contentions and conclusions, to which no response is required. To the extent a
26 response is required, Intervenor-Defendant denies the allegations in Paragraph 4.29.
27
28

1 DATED: November 15, 2020
2
3

4 By: /s Sarah R. Gonski

Sarah R. Gonski (Bar No. 032567)

PERKINS COIE LLP

2901 North Central Avenue, Suite 2000

Phoenix, Arizona 85012-2788

Telephone: 602.351.8000

Facsimile: 602.648.7000

SGonski@perkinscoie.com
8

9 Marc E. Elias*

PERKINS COIE LLP

700 Thirteenth Street NW, Suite 600

Washington, D.C. 20005-3960

Telephone: (202) 654-6200

Facsimile: (202) 654-6211

MElias@perkinscoie.com
10

11 Roy Herrera (Bar No. 032901)

Daniel A. Arellano (Bar No. 032304)

BALLARD SPAHR LLP

1 East Washington Street, Suite 2300

Phoenix, Arizona 85004-2555

Telephone: 602.798.5400

Facsimile: 602.798.5595

HerreraR@ballardspahr.com

ArellanoD@ballardspahr.com
12
13
14
15
16
17
18
19

**Pro hac vice application to be filed*

Attorneys for the Arizona Democratic Party
20
21
22
23
24
25
26
27
28