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IN THE SUPREME COURT OF THE STATE OF ALASKA

IN THE MATTER OF THE 2021
REDISTRICTING CASES (ALASKA
REDISTRICTING BOARD/
GIRDWOOD PLAINTIFFS/
EAST ANCHORAGE PLAINTIFFS)

Case No.: S-18419
Trial Court Case No.: 3AN-21-08869CI
(consolidated)

**CONDITIONAL REQUEST FOR LEAVE TO
PARTICIPATE AS AMICUS CURIAE**

For the reasons contained in their Response to the Petition for Review, Alaska Redistricting Board Members Nicole Borromeo and Melanie Bahnke they believe that, due to the extremely unusual and unauthorized circumstances leading to this proceeding,¹ they are entitled to file a Response to the Petition for Review filed by Matt Singer on behalf of the Alaska Redistricting Board.

Alternatively, if this Court finds that filing a Response is procedurally improper, Board Members Borromeo and Bahnke respectfully request leave to file their concurrently-filed Response as a Brief of an Amicus Curiae pursuant to Alaska Rule of Appellate Procedure 212(c)(9).

Board Members Borromeo and Bahnke have an interest in the outcome as they are extremely knowledgeable about the process (or lack thereof) that the Board undertook to

¹ In short, they believe that the Petition was not lawfully authorized and should be regarded as invalid by this Court.

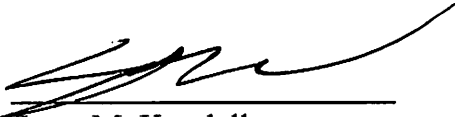
1 initiate its illegitimate Petition. Board Members Borromeo and Bahnke are also members
2 of the Board that counsel for Board purports to be acting on behalf of. Board Members
3 Borromeo and Bahnke therefore have an interest in the Board being held to its procedural
4 and Constitutional duties. The knowledge their Response to the Petition contains will
5 provide this Court with insight into the Petition's potentially dispositive defects.

6
7 Undersigned counsel was only retained yesterday afternoon and, due to the press
8 of reviewing documents and preparing the attached brief, has not been able to obtain an
9 answer from other counsel regarding whether or not they oppose this request. In any
10 event, based on conversations and review of documents, undersigned counsel does not
11 believe that consent would be granted by the Board's counsel.

12
13 For all of these reasons, Board Members Borromeo and Bahnke respectfully
14 request that, if their Response to the Petition is not otherwise accepted, it should instead
15 be accepted as an amicus brief under Appellate Rule 212(c)(9).

16 CASHION GILMORE & LINDEMUTH

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18 DATE: 5/20/22

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20 _____
21 Scott M. Kendall
22 Alaska Bar No. 0405019

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via email on May 20, 2022 on the following:

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