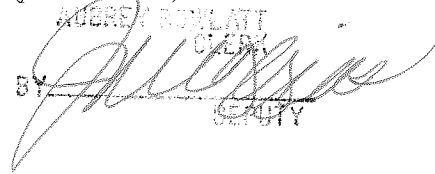


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**FIRST JUDICIAL DISTRICT COURT  
IN AND FOR CARSON CITY, STATE OF NEVADA**

DANIEL CORONA, DARIN MAINS, BRIAN MELENDEZ, TERESA MELENDEZ, OMAR ABDUL-RAHIM, DALE AULT, LYNN JOHN, GENE ROBERSON, LORENZITA SANTOS, NEVADA STATE DEMOCRATIC PARTY, DNC SERVICES CORPORATION/DEMOCRATIC NATIONAL COMMITTEE, DCCC, PRIORITIES USA, and THE NATIVE AMERICAN CAUCUS OF THE NEVADA STATE DEMOCRATIC PARTY,

Plaintiffs,

Case No. 20 OC 00064 1B

Dept. No.: II

**STIPULATION AND ORDER OF  
VOLUNTARY DISMISSAL  
PURSUANT TO NEVADA RULE OF  
CIVIL PROCEDURE 41**

1 vs.

2 BARBARA CEGAVSKE, in her official  
3 capacity as Nevada Secretary of State, JOSEPH  
4 GLORIA, in his official capacity as Registrar  
5 of Voters for Clark County, Nevada, DEANNA  
6 SPIKULA, in her official capacity as Registrar  
7 of Voters for Washoe County, Nevada,  
8 KRISTINE JAKEMAN, in her official capacity  
9 as the Elko County Clerk, and AARON FORD,  
10 in his official capacity as the Attorney General  
11 of the State of Nevada,

12 Defendants,

13 and

14 REPUBLICAN NATIONAL COMMITTEE  
15 and NEVADA REPUBLICAN PARTY,

16 Intervenor-Defendants.  
17

18 The parties, by and through their respective attorneys of record, hereby stipulate that  
19 Plaintiffs voluntarily dismiss this action in its entirety and without prejudice, pursuant to Nevada  
20 Rule of Civil Procedure 41(a)(1)(A)(ii).

21 Plaintiffs initiated this action on April 16, 2020 and filed an amended complaint on June  
22 19, 2020. In their amended complaint, Plaintiffs challenge the constitutionality of two features of  
23 the vote by mail process in Nevada that are particularly problematic given the ongoing COVID-  
24 19 pandemic: the Voter Assistance Ban, codified at Nevada Revised Statutes ("N.R.S.")  
25 293.330(4) and 293.353(4), which criminalizes efforts by third parties to assist voters in returning  
26 mail ballots; and the Ballot Rejection Rules, codified at N.R.S. 293.325 and 293.333, the State's  
27 signature matching regime. Plaintiffs allege that the Voter Assistance Ban and the Ballot Rejection  
28 Rules violate the right of suffrage guaranteed by Article II, Section 1 of the Nevada Constitution  
and unduly burden the right to vote protected by the due process clauses of the Nevada and U.S.  
Constitutions. Plaintiffs further allege that the Voter Assistance Ban imposes unconstitutional  
limitations on Plaintiffs' rights of political expression and assembly in violation of the Nevada and  
U.S. Constitutions.

1 On August 2, 2020, the Nevada Legislature enacted Assembly Bill 4. Among other  
2 provisions, Assembly Bill 4 amends the Voter Assistance Ban to allow for third-party collection  
3 of mail ballots and changes the Ballot Rejection Rules to provide clearer standards and more  
4 meaningful cure opportunities for Nevada voters. Assembly Bill 4 was signed into law by the  
5 Governor on August 3, 2020.

6 As a result of these developments, the parties hereby stipulate that Plaintiffs voluntarily  
7 dismiss this action in its entirety and without prejudice. Plaintiffs, Defendants, and Intervenor-  
8 Defendants agree that they will bear their own attorneys' fees, expenses, and costs.

9 **IT IS SO STIPULATED.**

10 DATED 4 day of August, 2020.

DATED this \_\_\_\_ day of August, 2020.

11 **WOLF, RIFKIN, SHAPIRO,**  
12 **SCHULMAN & RABKIN, LLP**

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26 *Attorneys for Plaintiffs*

27 *\*Admitted pro hac vice*

28 *///*

On August 2, 2020, the Nevada Legislature enacted Assembly Bill 4. Among other provisions, Assembly Bill 4 amends the Voter Assistance Ban to allow for third-party collection of mail ballots and changes the Ballot Rejection Rules to provide clearer standards and more meaningful cure opportunities for Nevada voters. Assembly Bill 4 was signed into law by the Governor on August 3, 2020.

As a result of these developments, the parties hereby stipulate that Plaintiffs voluntarily dismiss this action in its entirety and without prejudice. Plaintiffs, Defendants, and Intervenor-Defendants agree that they will bear their own attorneys' fees, expenses, and costs.

**IT IS SO STIPULATED.**

DATED \_\_\_\_ day of August, 2020.

**WOLF, RIFKIN, SHAPIRO,  
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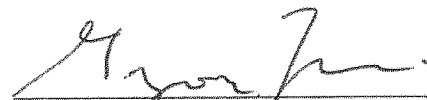
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*\*Admitted pro hac vice*

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DATED this <sup>4<sup>th</sup></sup> day of August, 2020.

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*Attorneys for Defendants  
Barbara Cegavske and Aaron Ford*

1 DATED 4<sup>th</sup> day of August, 2020.

DATED this \_\_\_\_ day of August, 2020.

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3 CIVIL DIVISION

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*Attorneys for Intervenor-Defendants Republican  
National Committee and Nevada Republican  
Party*

14 **ORDER**

15 Based on the foregoing stipulation of the parties, and good cause appearing, this action is  
16 dismissed without prejudice. Plaintiffs, Defendants, and Intervenor-Defendants will bear their own  
17 attorneys' fees, expenses, and costs.

18 **IT IS SO ORDERED.**

19 August \_\_\_\_, 2020.

20 JAMES E. WILSON  
21 District Judge

1 DATED \_\_\_\_ day of August, 2020.

DATED this 4<sup>th</sup> day of August, 2020.

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3 **CIVIL DIVISION**

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25 *National Committee and Nevada Republican*  
26 *Party*

27 **ORDER**

28 Based on the foregoing stipulation of the parties, and good cause appearing, this action is  
dismissed without prejudice. Plaintiffs, Defendants, and Intervenor-Defendants will bear their own  
attorneys' fees, expenses, and costs.

**IT IS SO ORDERED.**

August 4, 2020.

\_\_\_\_\_  
JAMES E. WILSON  
District Judge