

1 Timothy A. La Sota, Ariz. Bar No. 020539

2 **TIMOTHY A. LA SOTA, PLC**

3 2198 East Camelback Road, Suite 305

4 Phoenix, Arizona 85016

(602) 515-2649

5 [tim@timlasota.com](mailto:tim@timlasota.com)

6 *Attorney for Plaintiffs/Contestants*

7 Alexander Kolodin (030826)

8 Veronica Lucero (030292)

9 Arno Naeckel (026158)

10 James C. Sabalos (*pro hac vice*)

11 **Davillier Law Group, LLC**

12 4105 North 20th Street, Suite 110

13 Phoenix, Arizona 85016

14 T: (602) 730-2985

15 F: (602) 801-2539

16 [akolodin@davillierlawgroup.com](mailto:akolodin@davillierlawgroup.com)

17 [vlucero@davillierlawgroup.com](mailto:vlucero@davillierlawgroup.com)

18 [anaeckel@davillierlawgroup.com](mailto:anaeckel@davillierlawgroup.com)

19 [jsabalos@davillierlawgroup.com](mailto:jsabalos@davillierlawgroup.com)

20 [phxadmin@davillierlawgroup.com](mailto:phxadmin@davillierlawgroup.com)

21 *Attorneys for Plaintiff/Contestant Abraham Hamadeh*

Jennifer J. Wright (027145)

**JENNIFER WRIGHT ESQ., PLC**

4350 E. Indian School Road Ste #21-105

Phoenix, Arizona 85018

T: (602) 842-3061

[jen@jenwesq.com](mailto:jen@jenwesq.com)

Sigal Chattah Esq. (*pro hac vice*)

**CHATTAH LAW GROUP**

5875 S. Rainbow Blvd #204

Las Vegas, Nevada 89118

Tel: (702) 360-6200

Fax: (702) 643-6292

[Chattahlaw@gmail.com](mailto:Chattahlaw@gmail.com)

16 **IN THE SUPERIOR COURT FOR THE STATE OF ARIZONA**

17 **IN AND FOR THE COUNTY OF MOHAVE**

18 JEANNE KENTCH, an individual; *et al.*,

19 Plaintiffs/Contestants,

20 v.

21 KRIS MAYES,

22 Defendant/Contestee,

23 and

24 ADRIAN FONTES, *et al.*,

25 Defendants.

No. S8015CV202201468

**JOINT MOTION FOR ENTRY OF  
FINAL JUDGMENT PURSUANT TO  
ARIZONA RULE OF CIVIL  
PROCEDURE 54(C)**

***EXPEDITED CONSIDERATION  
REQUESTED***

(Before the Hon. Lee F. Jantzen)

1 The parties hereby request this Court to enter a final judgment pursuant to Arizona  
2 Rule of Civil Procedure 54(c).<sup>1</sup>

3 This Court entered a signed order on August 31, 2023. That order contained finality  
4 language required by Arizona Rule of Civil Procedure 54(c). But that order also left open,  
5 and requested additional orders, related to the ballot inspection costs associated with ballot  
6 inspections in Mohave and Navajo Counties. Thus, the Court's order was not actually final  
7 and appealable pursuant to Arizona Rule of Civil Procedure 54(c).

8 Therefore, to aid the Court with the two remaining issues and facilitate entry of a  
9 final appealable judgment, the parties have conferred and submit for this Court's  
10 consideration a form of judgment:

11 1. Indicating that Defendant Kris Mayes has withdrawn her request for costs  
12 (but not her request to be compensated for ballot inspection), and thus, amending this  
13 Court's prior order so that it does not reflect an award of her costs;

14 2. Awarding Defendant Mohave County ballot inspection costs of \$1,800.00;

15 3. Awarding Defendant Navajo County ballot inspection costs of \$542.00; and

16 4. Otherwise affirming this Court's August 31, 2023 Order.

17 Accordingly, the parties request this Court enter an order in the form submitted  
18 herewith, a copy of which is attached as Exhibit A.

19 RESPECTFULLY SUBMITTED this 6<sup>th</sup> day of September, 2023.

20 By: /s/ Jennifer J. Wright

21 Jennifer J. Wright (027145)

22 **JENNIFER WRIGHT ESQ., PLC**

23 /s/ Alexander Kolodin (with permission)

24 Alexander Kolodin (030826)

**Davillier Law Group, LLC**

25 <sup>1</sup> The movants are Contestant/Plaintiffs Abraham Hamadeh, Republican National  
26 Committee, Jeanne Kentch, and Ted Boyd, jointly with Contestee Kris Mayes and  
27 Defendants Arizona Secretary of State, Maricopa County, Mohave County, and Navajo  
28 County. All other parties were furnished a copy of this motion and asked to respond with  
their joinder or opposition. Apache County, Cochise County, Coconino County, Gila  
County, Graham County, Greenlee County, La Paz County, Pima County, Pinal County,  
Santa Cruz County, Yavapai County, and Yuma County did not respond at all.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

/s/ Sigal Chattah (with permission)  
Sigal Chattah Esq. (pro hac vice)  
**CHATTAH LAW GROUP**

/s/ Timothy La Sota (with permission)  
Timothy A La Sota, SBN # 020539  
**TIMOTHY A. LA SOTA, PLC**  
*Attorney for Plaintiffs/Contestants*

/s/ Alexis E. Danneman (with permission)  
Paul F. Eckstein  
Alexis E. Danneman  
Matthew R. Koerner  
Margo R. Casselman  
Samantha J. Burke  
**Perkins Coie LLP**  
*Attorneys for Contestee Mayes*

/s/ Craig Morgan (with permission)  
Craig Alan Morgan (AZ Bar No. 023373)  
Shayna Stuart (AZ Bar No. 034819)  
Jake T. Rapp (AZ Bar No. 036208)  
**LAW OFFICES SHERMAN &  
HOWARD L.L.C.**  
*Attorneys for Arizona Secretary of State*

/s/ Joseph E. LaRue (with permission)  
Thomas P. Liddy  
Joseph J. Branco  
Joseph E. LaRue  
Karen J. Hartman-Tellez  
Jack L. O'Connor III  
Sean Moore  
Rosa Aguilar  
**Maricopa County Attorney's Office**  
*Attorneys for Defendant Maricopa County*

/s/ Ryan Esplin (with permission)  
Ryan Esplin (029235)  
William Davis (037869)  
**Mohave County Attorney's Office**  
*Attorneys for Defendant Mohave County*

1 */s/ Jason S. Moore (with permission)*

2 Jason Moore

3 **Navajo County Attorney's Office**

4 *Attorneys for Defendant Navajo County*

5 ORIGINAL efiled and served via electronic means  
6 this 6th day of September, 2023, upon:

7 Honorable Lee F. Jantzen  
8 Mohave County Superior Court c/o  
9 Danielle Lecher  
10 division4@mohavecourts.com

11 Craig Alan Morgan (AZ Bar No. 023373)  
12 Shayna Stuart (AZ Bar No. 034819)  
13 Jake T. Rapp (AZ Bar No. 036208)  
14 LAW OFFICES SHERMAN & HOWARD L.L.C.  
15 2555 East Camelback Road, Suite 1050  
16 Phoenix, Arizona 85018  
17 Telephone: (602) 240-3000  
18 Fax: (602) 240-6600  
19 CMorgan@ShermanHoward.com  
20 SStuart@shermanhoward.com  
21 JRapp@ShermanHoward.com  
22 *Attorneys for Defendant Secretary of State Adrian Fontes*

23 Paul F. Eckstein  
24 Alexis E. Danneman  
25 Matthew R. Koerner  
26 Margo R. Casselman  
27 Samantha J. Burke  
28 Perkins Coie LLP  
29 2901 North Central Avenue, Suite 2000  
30 Phoenix, AZ 85012  
31 peckstein@perkinscoie.com  
32 adanneman@perkinscoie.com  
33 mkoerner@perkinscoie.com  
34 mcasselman@perkinscoie.com  
35 sburke@perkinscoie.com  
36 docketphx@perkinscoie.com  
37 *Attorneys for Defendant Kris Mayes*

1 Thomas P. Liddy  
2 Joseph J. Branco  
3 Joseph E. LaRue  
4 Karen J. Hartman-Tellez  
5 Jack L. O'Connor III  
6 Sean Moore  
7 Rosa Aguilar  
8 Maricopa County Attorney's Office  
9 225 West Madison St.  
10 Phoenix, AZ 85003  
11 [liddy@mcao.maricopa.gov](mailto:liddy@mcao.maricopa.gov)  
12 [branco@mcao.maricopa.gov](mailto:branco@mcao.maricopa.gov)  
13 [larue@mcao.maricopa.gov](mailto:larue@mcao.maricopa.gov)  
14 [hartmank@mcao.maricopa.gov](mailto:hartmank@mcao.maricopa.gov)  
15 [occonnor@mcao.maricopa.gov](mailto:occonnor@mcao.maricopa.gov)  
16 [moores@mcao.maricopa.gov](mailto:moores@mcao.maricopa.gov)  
17 [aguilarr@mcao.maricopa.gov](mailto:aguilarr@mcao.maricopa.gov)

18 Emily Craiger  
19 The Burgess Law Group  
20 3131 East Camelback Road, Suite 224  
21 Phoenix, Arizona 85016  
22 [Emily@theburgesslawgroup.com](mailto:Emily@theburgesslawgroup.com)  
23 *Attorneys for Defendant, Stephen Richer, Maricopa County Recorder,*  
24 *And Maricopa County Board of Supervisors*

25 Celeste Robertson  
26 Apache County Attorney's Office  
27 245 West 1st South  
28 St. Johns, AZ 85936  
29 [attorneysgroup@apachecountaz.gov](mailto:attorneysgroup@apachecountaz.gov)  
30 *Attorneys for Defendant, Larry Noble, Apache County Recorder,*  
31 *and Apache County Board of Supervisors*

32 Christine J. Roberts  
33 Paul Correa  
34 Cochise County Attorney's Office  
35 Bisbee, AZ 85603  
36 [croberts@cochise.az.gov](mailto:croberts@cochise.az.gov)  
37 [pcorrea@cochise.az.gov](mailto:pcorrea@cochise.az.gov)  
38 *Attorneys for Defendant, David W. Stevens, Cochise County Recorder,*  
39 *and Cochise County Board of Supervisors*

1 Bill Ring  
2 Coconino County Attorney's Office 110  
3 East Cherry Avenue  
4 Flagstaff, AZ 86001  
5 [wring@coconino.az.gov](mailto:wring@coconino.az.gov)  
6 *Attorney for Defendant, Patty Hansen, Coconino County Recorder,*  
7 *and Coconino County Board of Supervisors*

8 Jeff Dalton  
9 Gila County Attorney's Office  
10 1400 East Ash Street  
11 Globe, AZ 85551  
12 [jdalton@gilacountyaz.gov](mailto:jdalton@gilacountyaz.gov)  
13 *Attorney for Defendant, Sadie Jo Bingham, Gila County Recorder,*  
14 *and Gila County Board of Supervisors*

15 Jean Roof  
16 Graham County Attorney's Office  
17 800 West Main Street  
18 Safford, AZ 85546  
19 [jroof@graham.az.gov](mailto:jroof@graham.az.gov)  
20 *Attorneys for Defendant, Polly Merriman, Graham County Recorder,*  
21 *and Graham County Board of Supervisors*

22 Scott Adams  
23 Greenlee County Attorney's Office  
24 P.O. Box 1717  
25 Clifton, AZ 85533  
26 [sadams@greenlee.az.gov](mailto:sadams@greenlee.az.gov)  
27 *Attorney for Defendant, Sharie Milheiro, Greenlee County Recorder,*  
28 *and Greenlee County Board of Supervisors*

29 Ryan N. Dooley  
30 La Paz County Attorney's Office  
31 1320 Kofa Avenue  
32 Parker, AZ 85344  
33 [rdooley@lapazcountyaz.org](mailto:rdooley@lapazcountyaz.org)  
34 *Attorney for Defendant, Richard Garcia, La Paz County Recorder,*  
35 *and La Paz County Board of Supervisors*

1 Ryan Esplin  
2 William Davis  
3 Mohave County Attorney's Office Civil Division  
4 P.O. Box 7000  
5 Kingman, AZ 86402-7000  
6 [esplir@mohave.gov](mailto:esplir@mohave.gov)  
7 [davisw@mohave.gov](mailto:davisw@mohave.gov)  
8 [caocivil.court@mohave.gov](mailto:caocivil.court@mohave.gov)  
9 *Attorney for Defendant, Kristi Blair, Mohave County Recorder,*  
10 *and Mohave County Board of Supervisors*

11 Jason Moore  
12 Navajo County Attorney's Office  
13 P.O. Box 668  
14 Holbrook, AZ 86025-0668  
15 [jason.moore@navajocountyaz.gov](mailto:jason.moore@navajocountyaz.gov)  
16 *Attorney for Defendant, Michael Sample, Navajo County Recorder,*  
17 *and Navajo County Board of Supervisors*

18 Daniel Jurkowitz  
19 Ellen Brown  
20 Javier Gherna  
21 Pima County Attorney's Office  
22 32 N. Stone #2100  
23 Tucson, AZ 85701  
24 [Daniel.Jurkowitz@pcao.pima.gov](mailto:Daniel.Jurkowitz@pcao.pima.gov)  
25 [Ellen.Brown@pcao.pima.gov](mailto:Ellen.Brown@pcao.pima.gov)  
26 [Javier.Gherna@pcao.pima.gov](mailto:Javier.Gherna@pcao.pima.gov)  
27 *Attorney for Gabriela Cázares-Kelley, Pima County Recorder,*  
28 *and Pima County Board of Supervisors*

29 Craig Cameron  
30 Scott Johnson  
31 Jim Mitchell  
32 Pinal County Attorney's Office  
33 30 North Florence Street  
34 Florence, AZ 85132  
35 [craig.cameron@pinal.gov](mailto:craig.cameron@pinal.gov)  
36 [scott.m.johnson@pinal.gov](mailto:scott.m.johnson@pinal.gov)  
37 [james.mitchell@pinal.gov](mailto:james.mitchell@pinal.gov)  
38 *Attorneys for Defendant, Dana Lewis, Pinal County Recorder,*  
39 *and Pinal County Board of Supervisors*

1 Robert F. May  
2 Kimberly Hunley  
3 Santa Cruz County Attorney's Office  
4 2150 North Congress Drive, Suite 201  
5 Nogales, AZ 85621-1090  
6 [khunley@santacruzcountyaz.gov](mailto:khunley@santacruzcountyaz.gov)  
7 *Attorneys for Defendant, Suzanne Sainz, Santa Cruz County Recorder,*  
8 *and Santa Cruz County Board of Supervisors*

9 Thomas M. Stoxen  
10 Michael J. Gordon  
11 Yavapai County Attorney's Office  
12 255 East Gurley Street, 3<sup>rd</sup> Floor  
13 Prescott, AZ 86301  
14 [Thomas.Stoxen@yavapaiaz.gov](mailto:Thomas.Stoxen@yavapaiaz.gov)  
15 [Michael.Gordon@yavapaiaz.gov](mailto:Michael.Gordon@yavapaiaz.gov)  
16 *Attorney for Defendant, Michelle M. Burchill, Yavapai County Recorder,*  
17 *and Yavapai County Board of Supervisors*

18 Bill Kerekes  
19 Yuma County Attorney's Office  
20 198 South Main Street  
21 Yuma, AZ 85364  
22 [bill.kerekes@yumacountyaz.gov](mailto:bill.kerekes@yumacountyaz.gov)  
23 *Attorney for Defendant, Richard Colwell, Yuma County Recorder,*  
24 *and Yuma County Board of Supervisors*

25  
26  
27  
28  
/s/ Jennifer J. Wright



# **EXHIBIT**

**A**

1                                   **IN THE SUPERIOR COURT FOR THE STATE OF ARIZONA**  
2                                   **IN AND FOR THE COUNTY OF MOHAVE**

3           JEANNE KENTCH, an individual; *et al.*,  
4                                   Plaintiffs/Contestants,

No. S8015CV202201468

5                                   v.

**JUDGMENT**

6           KRIS MAYES,  
7                                   Defendant/Contestee,

(Before the Hon. Lee F. Jantzen)

8                                   and

9           ADRIAN FONTES, *et al.*,  
                                  Defendants.

10  
11           The Court, having considered the parties' Joint Motion for Entry of a Final Judgment  
12 Pursuant to Arizona Rule of Civil Procedure 54(c) (the "Motion"), and good cause  
13 appearing for the relief the parties seek in their Motion,

14           **IT IS HEREBY ORDERED** granting the Motion.

15           **IT IS FURTHER ORDERED**, incorporating by reference herein this Court's  
16 August 31, 2023 Order except as modified herein.

17           **IT IS FURTHER ORDERED** recognizing that defendant Kris Mayes had revoked  
18 her request for costs, and therefore, having withdrawn her request for costs, she is awarded  
19 no costs in this action. She remains entitled to \$2,892.50 for her ballot inspector, and  
20 Plaintiffs are jointly and severally responsible for payment of that amount to Kris Mayes.

21           **IT IS FURTHER ORDERED** that, pursuant to A.R.S. § 16-677(C), Plaintiffs,  
22 jointly and severally, shall compensate Defendant Mohave County in the amount of  
23 \$1,800.00 for its ballot inspectors.

24           **IT IS FURTHER ORDERED** that, pursuant to A.R.S. § 16-677(C), Plaintiffs shall,  
25 jointly and severally, compensate Defendant Navajo County in the amount of \$542.00 for  
26 its ballot inspectors.

27           **IT IS FURTHER ORDERED** confirming the 2022 General Election in which Kris  
28 Mayes was elected as Arizona Attorney General.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**IT IS FURTHER ORDERED** otherwise reaffirming the content of this Court's August 31, 2023 Order, except as modified herein.

**IT IS FURTHER ORDERED** finding that no further matters pending before this Court, and therefore final judgment is entered pursuant to Arizona Rule of Civil Procedure 54(c).

DATED \_\_\_\_\_, 2023.

---

Honorable Lee F. Jantzen  
Division 4  
Judge of the Mohave County Superior Court