

## Angela Cox

---

**From:** Jason Zavadil <Jason@ITRLaw.com>  
**Sent:** Monday, August 30, 2021 2:03 PM  
**To:** Angela Cox; Pedro Irigonegaray; Schlozman, Brad J.; Frost, Elisabeth C. (Perkins Coie)  
**Cc:** Brewster, Henry (Perkins Coie); Callais, Amanda R. (Perkins Coie); Dalke, Krystle M.; Schillings, Scott R.  
**Subject:** 2021-CV-299  
**Attachments:** Letter to Judge Watson.pdf

**EXTERNAL:** This email originated from outside of the Court. Do not click any links or open any attachments unless you trust the sender and know that the content is safe.

Please see the attached letter from Mr. Irigonegaray to Judge Watson.

Respectfully,  
Jason A. Zavadil  
Irigonegaray, Turney, & Revenaugh, L.L.P.  
1535 SW 29<sup>th</sup> St  
Topeka, KS 66611  
785.267.6115 (p)  
785.267.9458 (f)

FILED BY CLERK  
KS DISTRICT COURT  
THIRD JUDICIAL DIST  
TOPEKA, KS  
2021 AUG 31 A 11:21

**THIS ELECTRONIC COMMUNICATION IS PRIVILEGED AND CONFIDENTIAL  
IMPORTANT NOTICE TO EMAIL RECIPIENTS:**

*DO NOT read, copy, or disseminate this communication unless you are the intended addressee. This email communication contains confidential and/or privileged information intended only for the addressee. Anyone who receives this email by error should treat it as confidential and is asked to call Irigonegaray, Turney, & Revenaugh, L.L.P. at 785.267.6115, reply by email, or by fax at 785.267.9458. This email transmission may not be secure and may be illegally intercepted. Do not forward or disseminate this email to any third party. Unauthorized interception of this email is a violation of federal law. Any reliance on the information contained in this correspondence by someone who has not entered into a fee agreement with Irigonegaray, Turney, & Revenaugh, L.L.P. is taken at the reader's own risk.*



IRIGONEGARAY,  
TURNEY, &  
REVENAUGH, L.L.P.

PEDRO L. IRIGONEGARAY\*  
J. BO TURNEY  
NICOLE M. REVENAUGH  
JASON A. ZAVADIL  
ATTORNEYS AT LAW

August 30, 2021

2021CV2019

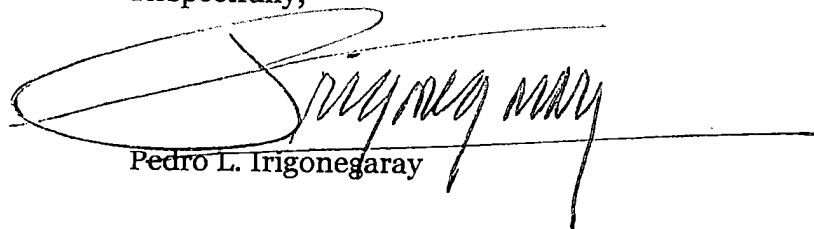
Honorable Teresa L. Watson  
Division 3  
Shawnee County District Court  
via email: [acox@shawneecourt.org](mailto:acox@shawneecourt.org)

Dear Judge Watson:

I am following up on our correspondence regarding the timing of ruling on the pending motion for a partial temporary injunction in the matter of *League of Women Voters et al. v. Scott Schwab et al.*, Original Action No. 2021-CV-000299, which has been fully briefed and submitted since at least July 9, 2021. The parties have also advised the Court that they are in agreement that the filing of the amended complaint does not impact that pending motion, for the reasons set forth in the papers filed in response to the Court's August 13th inquiry.

As we have stressed, the continuing applicability of Kansas's Voter Education Restriction (HB 2183, New Sec. 3(a)(2)-(3)), which the motion seeks to temporarily enjoin, is presently chilling the plaintiffs' voter registration and education activities, and has been since it became effective on July 1, 2021. This harm will only be compounded by the swiftly-approaching fall elections. In light of these ongoing concerns of serious, irreparable harm, and the requirements of Kansas Rule Related to District Court 166 – Time for Ruling on Motion; Matter Taken under Advisement, we write again to respectfully inquire as to when the Court anticipates issuing a ruling in this matter.

Respectfully,



Pedro L. Irigonegaray