

Angela Cox

2021CV-299

**From:** Schlozman, Brad J. <bschlozman@hinklaw.com>  
**Sent:** Monday, August 30, 2021 3:37 PM  
**To:** Angela Cox  
**Cc:** Brewster, Henry (Perkins Coie); Callais, Amanda R. (Perkins Coie); Dalke, Krystle M.; Schillings, Scott.R.; Pedro Irigonegaray; Frost, Elisabeth C. (Perkins Coie); Jason Zavadil  
**Subject:** League of Women Voters et al. v. Schwab et al. -- RE: Case No. 2021-CV-299  
**Attachments:** Response to Pls.' 8-30-2021 Letter re Timing of Ruling on Pls. Mtn for PI (8-30-2021).pdf

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Dear Ms. Cox:

Attached you will find a Response from Defendants to the letter Mr. Irigonegaray e-mailed to Judge Watson earlier this afternoon in the above-captioned case. Thanks very much.

Brad Schlozman

cc: Counsel for Plaintiffs

**From:** Jason Zavadil [mailto:Jason@ITRLaw.com]  
**Sent:** Monday, August 30, 2021 2:03 PM  
**To:** acox@shawneecourt.org; Pedro Irigonegaray <Pedro@ITRLaw.com>; Schlozman, Brad J. <bschlozman@hinklaw.com>; Frost, Elisabeth C. (Perkins Coie) <EFrost@perkinscoie.com>  
**Cc:** Brewster, Henry (Perkins Coie) <HBrewster@perkinscoie.com>; Callais, Amanda R. (Perkins Coie) <ACallais@perkinscoie.com>; Dalke, Krystle M. <kdalke@hinklaw.com>; Schillings, Scott R. <sschillings@hinklaw.com>  
**Subject:** 2021-CV-299

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 DISTRICT COURT  
 AND JUDICIAL DIST.  
 TOPEKA, KS  
 2021 AUG 31 A 11:20

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  
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[bschlozman@hinklaw.com](mailto:bschlozman@hinklaw.com)

August 30, 2021

VIA E-MAIL (acox@shawneecourt.org)


Honorable Teresa L. Watson  
Shawnee County District Court - Division 3  
200 S.E. 7th Street, Office 324  
Topeka, KS 66603

Re: *League of Women Voters et al. v. Schwab et al.*, Case No. 2021-CV-000299

Dear Judge Watson:

Defendants just received Plaintiffs' e-mailed letter to the Court, dated today, claiming ongoing irreparable harm from H.B. 2183, § 3 - a statute prohibiting the false representation of an election official - and requesting a time frame as to when the Court will rule on Plaintiffs' motion for a partial preliminary injunction on this issue in the above-captioned matter. Notwithstanding our great respect for Plaintiffs' counsel, Defendants submit - as we pointed out at length in both our response to the Plaintiffs' partial preliminary injunction motion and in our recently-filed motion to dismiss their amended petition - that the "harm" and "serious concerns" Plaintiffs allege here are entirely manufactured and in no way implicated by the statute. There is simply no legitimate threat of any harm to Plaintiffs' constitutional rights in this case, and Plaintiffs' apparent decision to refrain from engaging in certain activities that they subjectively believe - without foundation - will lead to enforcement actions against them provides no grounds for affording them relief.

Respectfully,



Bradley J. Schlozman

cc: All counsel of record (via e-mail)

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