

DAVID N. WOLF (6688)  
LANCE F. SORENSON (10684)  
JEFFREY B. TEICHERT (7000)  
Assistant Utah Attorneys General  
OFFICE OF THE UTAH ATTORNEY GENERAL  
160 East 300 South, Sixth Floor  
P.O. Box 140856  
Salt Lake City, Utah 84114-0856  
Telephone: (385) 441-4218  
E-mail: [lancesorenson@agutah.gov](mailto:lancesorenson@agutah.gov)  
*Counsel for Defendant Lieutenant Governor Deidre Henderson*

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**IN THE THIRD JUDICIAL DISTRICT COURT  
IN AND FOR SALT LAKE COUNTY, STATE OF UTAH**

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LEAGUE OF WOMEN VOTERS OF UTAH,  
MORMON WOMEN FOR ETHICAL  
GOVERNMENT, STEFANIE CONDIE,  
MALCOLM REID, VICTORIA REID, WENDY  
MARTIN, ELEANOR SUNDWALL, JACK  
MARKMAN, and DALE COX,

Plaintiffs,

v.

UTAH STATE LEGISLATURE; UTAH  
LEGISLATIVE REDISTRICTING COMMITTEE;  
SENATOR SCOTT SANDALL, in his official  
capacity; REPRESENTATIVE BRAD WILSON, in  
his official capacity; SENATOR J. STUART  
ADAMS, in his official capacity; and  
LIEUTENANT GOVERNOR DEIDRE  
HENDERSON, in her official capacity,

Defendants.

**LIEUTENANT GOVERNOR DEIDRE  
HENDERSON'S ANSWER TO  
PLAINTIFFS' COMPLAINT FOR  
DECLARATORY AND INJUNCTIVE  
RELIEF**

Case No.: 220901712

Honorable Dianna Gibson

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Defendant Lieutenant Governor Deidre Henderson (“Lt. Governor”) submits this Answer to Plaintiffs’ Complaint. The Lt. Governor is Utah’s chief elections officer. Utah Code § 20A-2-300.6(1). The Lt. Governor is statutorily obligated to make available to county clerks and the general public Congressional district maps submitted to her by the Legislature. Such maps are the legal boundaries of Utah’s Congressional districts. Utah Code § 20A-13-102 & 102.2. The Lt. Governor and county clerks are statutorily obligated to conduct elections pursuant to those maps unless otherwise ordered by a court of competent jurisdiction. *Id.*

Plaintiffs complain of actions taken by the Utah Legislature, its redistricting committee, and individual members of the Legislature, but do not complain of any action taken by the Lt. Governor. Rather, Plaintiffs have included the Lt. Governor in this action to enjoin her from administering Congressional elections pursuant to the Congressional districts enacted by the Legislature. Thus, virtually all of the allegations of Plaintiffs’ Complaint are directed to parties other than the Lt. Governor, and the Lt. Governor responds accordingly.

The Lt. Governor asserts her defenses as follows:

**FIRST DEFENSE**

Plaintiffs’ Complaint fails to state a claim upon which relief may be granted.

**SECOND DEFENSE**

The Lt. Governor responds to the numbered paragraphs of Plaintiffs’ Complaint as follows:

**INTRODUCTION**

1. The allegations of paragraph 1 of Plaintiffs’ Complaint are not directed to the responding defendant and contain conclusions of law and thus no response is required.

2. The allegations of paragraph 2 of Plaintiffs' Complaint are not directed to the responding defendant and contain conclusions of law and thus no response is required.

3. The allegations of paragraph 3 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

4. The allegations of paragraph 4 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

5. The allegations of paragraph 5 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

6. The allegations of paragraph 6 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

7. The allegations of paragraph 7 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

8. The allegations of paragraph 8 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

9. The allegations of paragraph 9 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

10. The allegations of paragraph 10 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

11. The allegations of paragraph 11 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

12. The allegations of paragraph 12 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

## **PARTIES**

13. The allegations of paragraph 13 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

14. The allegations of paragraph 14 of Plaintiffs' Complaint are not directed to the responding defendant and contain conclusions of law and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

15. The allegations of paragraph 15 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

16. The allegations of paragraph 16 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

17. The allegations of paragraph 17 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

18. The allegations of paragraph 18 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

19. The allegations of paragraph 19 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

20. The allegations of paragraph 20 of Plaintiffs' Complaint are not directed to the responding defendant and contain conclusions of law and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

21. The allegations of paragraph 21 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

22. The allegations of paragraph 22 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

23. The allegations of paragraph 23 of Plaintiffs' Complaint are not directed to the responding defendant and contain conclusions of law and thus no response is required. To the

extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

24. The allegations of paragraph 24 of Plaintiffs' Complaint are not directed to the responding defendant and contain conclusions of law and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

25. The allegations of paragraph 25 of Plaintiffs' Complaint are not directed to the responding defendant and contain conclusions of law and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

26. The allegations of paragraph 26 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

27. The allegations of paragraph 27 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

28. Admitted that the individual plaintiffs are seven registered voters in Utah. The Lt. Governor lacks sufficient information to admit or deny the remainder the allegations in this paragraph and therefore denies the same.

29. The allegations of paragraph 29 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor admits that Plaintiff Stefanie Condie is registered to vote as a Democrat, but the Lt. Governor lacks sufficient information to either admit or deny the remaining allegations in this paragraph and therefore denies the same.

30. The allegations of paragraph 30 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor admits that Plaintiff Wendy Martin is registered to vote as a Democrat, but the Lt. Governor lacks sufficient information to either admit or deny the remaining allegations in this paragraph and therefore denies the same.

31. The allegations of paragraph 31 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor admits that Plaintiff Malcolm Reid is registered to vote as a Democrat, but the Lt. Governor lacks sufficient information to either admit or deny the remaining allegations in this paragraph and therefore denies the same.

32. The allegations of paragraph 32 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor admits that Plaintiff Jack Markman is registered to vote as a Democrat, but the Lt. Governor lacks sufficient information to either admit or deny the remaining allegations in this paragraph and therefore denies the same.

33. The allegations of paragraph 33 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed

necessary, the Lt. Governor admits that Plaintiff Eleanor Sundwall is registered to vote as a Democrat, but the Lt. Governor lacks sufficient information to either admit or deny the remaining allegations in this paragraph and therefore denies the same.

34. The allegations of paragraph 34 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor admits that Plaintiff Victoria Reid is registered to vote as a Republican, but the Lt. Governor lacks sufficient information to either admit or deny the remaining allegations in this paragraph and therefore denies the same.

35. The allegations of paragraph 35 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor admits that Plaintiff Dale Cox is registered to vote as a Republican, but the Lt. Governor lacks sufficient information to either admit or deny the remaining allegations in this paragraph and therefore denies the same.

36. The allegations of paragraph 36 of Plaintiffs' Complaint are not directed to the responding defendant and contain conclusions of law and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

37. The allegations of paragraph 37 of Plaintiffs' Complaint are not directed to the responding defendant and contain conclusions of law and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor denies the allegations in this paragraph.



38. The allegations of paragraph 38 of Plaintiffs' Complaint contain conclusions of law to which no response is required. Additionally, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

39. The allegations of paragraph 39 of Plaintiffs' Complaint contain conclusions of law to which no response is required. Additionally, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

### **DEFENDANTS**

40. Admitted that the Utah Legislature is the legislative branch of the State of Utah. The remainder of the allegations of paragraph 40 constitute legal conclusions to which no response is required.

41. The allegations of Paragraph 41 of Plaintiffs' Complaint are not directed to the responding defendant and contain conclusions of law and thus no response is required.

42. The allegations of Paragraph 42 of Plaintiffs' Complaint are not directed to the responding defendant and contain conclusions of law and thus no response is required.

43. The allegations of paragraph 43 of Plaintiffs' Complaint are not directed to the responding defendant and contain conclusions of law and thus no response is required. To the extent a response is deemed necessary, the LG admits the allegations in this paragraph.

44. The allegations of paragraph 44 of Plaintiffs' Complaint are not directed to the responding defendant and contain conclusions of law and thus no response is required. To the extent a response is deemed necessary, the LG admits the allegations in this paragraph.

45. The allegations of paragraph 45 of Plaintiffs' Complaint contain conclusions of law thus no response is required. To the extent a response is deemed necessary, the LG admits the allegations in this paragraph.

#### **JURISDICTION AND VENUE**

46. The allegations in this paragraph are legal conclusions to which no response is required. To the extent that a response is deemed necessary, the Lt. Governor denies the allegations contained in this paragraph.

47. The allegations in this paragraph are legal conclusions to which no response is required.

48. The allegations in this paragraph are legal conclusions to which no response is required.

49. The allegations in this paragraph are legal conclusions to which no response is required.

#### **FACTUAL ALLEGATIONS**

50. The allegations of paragraph 50 of Plaintiffs' Complaint are not directed to the responding defendant and contain conclusions of law thus no response is required. To the extent a response is deemed necessary, the LG admits the allegations in this paragraph.

51. The allegations of paragraph 51 of Plaintiffs' Complaint are not directed to the responding defendant and contain conclusions of law and thus no response is required. To the extent a response is deemed necessary, the LG admits the allegations in this paragraph.

52. The allegations of paragraph 52 of Plaintiffs' Complaint are not directed to the responding defendant and contain conclusions of law and thus no response is required. To the extent a response is deemed necessary, the LG admits the allegations in this paragraph.

53. The allegations of paragraph 53 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

54. The allegations of paragraph 54 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

55. The allegations of paragraph 55 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

56. The allegations of paragraph 56 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

57. The allegations of paragraph 57 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed

necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

58. The allegations of paragraph 58 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

59. The allegations of paragraph 59 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

60. The allegations of paragraph 60 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

61. The allegations of paragraph 61 of Plaintiffs' Complaint are not directed to the responding defendant and contain conclusions of law and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

62. The allegations of paragraph 62 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

63. The allegations of paragraph 63 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed necessary, the LG admits that Utah gained an additional seat in Congress in 2011. The Lt. Governor lacks sufficient information to either admit or deny the remaining allegations in this paragraph and therefore denies the same.

64. The allegations of paragraph 64 of Plaintiffs' Complaint are not directed to the responding defendant and contain conclusions of law and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

65. The allegations of paragraph 65 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

66. The allegations of paragraph 66 of Plaintiffs' Complaint are not directed to the responding defendant and contain conclusions of law and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor admits the allegations in this paragraph.

67. The allegations of paragraph 67 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

68. The allegations of paragraph 68 of Plaintiffs' Complaint are not directed to the responding defendant and contain legal conclusions to which no response is required. Utah's Constitution and statutes speak for themselves.

69. The allegations of paragraph 69 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

70. The allegations of paragraph 70 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

71. The allegations of paragraph 71 of Plaintiffs' Complaint are not directed to the responding defendant and contain legal conclusions to which no response is required. Utah's Constitution speaks for itself.

72. The allegations of paragraph 72 of Plaintiffs' Complaint are not directed to the responding defendant and contain legal conclusions to which no response is required.

73. Admitted that in November 2018, the people enacted Proposition 4 by initiative. The remaining allegations of paragraph 73 contain legal conclusions to which no response is required. To the extent that a response is deemed necessary, the Lt. Governor denies the remaining allegations contained in this paragraph.

74. The allegations of paragraph 74 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed

necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

75. The allegations of paragraph 75 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

76. The allegations of paragraph 76 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor admits that nearly 200,000 signatures were submitted in favor of the Proposition 4 ballot initiative but denies that all of the signatures were valid. The Lt. Governor lacks sufficient information to admit or deny the remaining allegations of paragraph 76 of Plaintiffs' Complaint and therefore denies the same.

77. The allegations of paragraph 77 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

78. The allegations of paragraph 78 of Plaintiffs' Complaint are not directed to the responding defendant and contain legal conclusions to which no response is required.

79. The allegations of paragraph 79 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same..

80. The allegations of paragraph 80 of Plaintiffs' Complaint are not directed to the responding defendant and contain legal conclusions to which no response is required.

81. The allegations of paragraph 81 of Plaintiffs' Complaint are not directed to the responding defendant and contain legal conclusions to which no response is required.

82. The allegations of paragraph 82 of Plaintiffs' Complaint are not directed to the responding defendant and contain legal conclusions to which no response is required.

83. The allegations of paragraph 83 of Plaintiffs' Complaint are not directed to the responding defendant and contain legal conclusions to which no response is required.

84. The allegations of paragraph 84 of Plaintiffs' Complaint are not directed to the responding defendant and contain legal conclusions to which no response is required.

85. The allegations of paragraph 85 of Plaintiffs' Complaint are not directed to the responding defendant and contain legal conclusions to which no response is required.

86. The allegations of paragraph 86 of Plaintiffs' Complaint are not directed to the responding defendant and contain legal conclusions to which no response is required.

87. The allegations of paragraph 87 of Plaintiffs' Complaint are not directed to the responding defendant and contain legal conclusions to which no response is required.

88. The allegations of paragraph 88 of Plaintiffs' Complaint are not directed to the responding defendant and contain legal conclusions to which no response is required.

89. The allegations of paragraph 89 of Plaintiffs' Complaint are not directed to the responding defendant and contain legal conclusions to which no response is required.

90. The Lt. Governor admits that proposition 4 received enough votes to enact it into law. The Lt. Governor lacks sufficient information to either admit or deny the remaining allegations in this paragraph and therefore denies the same.



91. The allegations of paragraph 91 of Plaintiffs' Complaint are not directed to the responding defendant and contain legal conclusions to which no response is required. To the extent that a response is deemed necessary, the Lt. Governor denies the allegations contained in this paragraph.

92. The allegations in this paragraph are not directed to the responding defendant thus no response is required.

93. The allegations of paragraph 93 of Plaintiffs' Complaint are not directed to the responding defendant and contain legal conclusions; thus, no response is required.

94. The allegations of paragraph 94 of Plaintiffs' Complaint are not directed to the responding defendant and contain legal conclusions; thus, no response is required.

95. The allegations of paragraph 95 of Plaintiffs' Complaint are not directed to the responding defendant and contain legal conclusions; thus, no response is required.

96. The allegations of paragraph 96 of Plaintiffs' Complaint are not directed to the responding defendant and contain legal conclusions; thus, no response is required.

97. The allegations of paragraph 97 of Plaintiffs' Complaint are not directed to the responding defendant and contain legal conclusions; thus, no response is required.

98. The allegations of paragraph 98 of Plaintiffs' Complaint are not directed to the responding defendant and contain legal conclusions; thus, no response is required.

99. The allegations of paragraph 99 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

100. The allegations of paragraph 100 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

101. The allegations of paragraph 101 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

102. The allegations of paragraph 102 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

103. The allegations of paragraph 103 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

104. The allegations of paragraph 104 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

105. The allegations of paragraph 105 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

106. The allegations of paragraph 106 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

107. The allegations of paragraph 107 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

108. The allegations of paragraph 108 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary,

the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

109. The allegations of paragraph 109 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

110. The allegations of paragraph 110 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

111. The allegations of paragraph 111 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

112. The allegations of paragraph 112 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

113. The allegations of paragraph 113 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

114. The allegations of paragraph 114 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

115. The allegations of paragraph 115 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

116. The allegations of paragraph 116 of Plaintiffs' Complaint are not directed to the responding defendant and contain legal conclusions to which no response is required.

117. The allegations of paragraph 117 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

118. The allegations of paragraph 118 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

119. The allegations of paragraph 119 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

120. The allegations of paragraph 120 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

121. The allegations of paragraph 121 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

122. The allegations of paragraph 122 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

123. The allegations of paragraph 123 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

124. The allegations of paragraph 124 of Plaintiffs' Complaint are not directed to the responding defendant and contain legal conclusions to which no response is required. Further, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

125. The allegations of paragraph 125 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary,

the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

126. The allegations of paragraph 126 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

127. The allegations of paragraph 127 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

128. The allegations of paragraph 128 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor admits that Rob Bishop is a former representative of Utah's 1<sup>st</sup> Congressional District and lacks sufficient information to either admit or deny the remaining allegations in this paragraph and therefore denies the same.

129. The allegations of paragraph 129 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

130. The allegations of paragraph 130 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary,

the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

131. The allegations of paragraph 131 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

132. The allegations of paragraph 132 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

133. The allegations of paragraph 133 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

134. The allegations of paragraph 134 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

135. The allegations of paragraph 135 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

136. The allegations of paragraph 136 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

137. The allegations of paragraph 137 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

138. The allegations of paragraph 138 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

139. The allegations of paragraph 139 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

140. The allegations of paragraph 140 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

141. The allegations of paragraph 141 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.



142. The allegations of paragraph 142 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

143. The allegations of paragraph 143 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

144. The allegations of paragraph 144 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

145. The allegations of paragraph 145 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

146. The allegations of paragraph 146 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

147. The allegations of paragraph 147 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

148. The allegations of paragraph 148 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

149. The allegations of paragraph 149 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

150. The allegations of paragraph 150 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

151. The allegations of paragraph 151 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

152. The allegations of paragraph 152 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

153. The allegations of paragraph 153 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

154. The allegations of paragraph 154 of Plaintiffs' Complaint are not directed to the responding defendant and contain legal conclusions to which no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

155. The allegations of paragraph 155 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same..

156. The allegations of paragraph 156 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same..

157. The allegations of paragraph 157 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

158. The allegations of paragraph 158 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

159. The allegations of paragraph 159 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

160. The allegations of paragraph 160 of Plaintiffs' Complaint are not directed to the responding defendant and contain legal conclusions to which no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

161. The allegations of paragraph 161 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

162. The allegations of paragraph 162 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

163. The allegations of paragraph 163 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

164. The allegations of paragraph 164 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

165. The allegations of paragraph 165 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary,

the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

166. The allegations of paragraph 166 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

167. The allegations of paragraph 167 of Plaintiffs' Complaint are not directed to the responding defendant and contain legal conclusions to which no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

168. The allegations of paragraph 168 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

169. The allegations of paragraph 169 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

170. The allegations of paragraph 170 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

171. The allegations of paragraph 171 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

172. The allegations of paragraph 172 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

173. The allegations of paragraph 173 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

174. The allegations of paragraph 174 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

175. The allegations of paragraph 175 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

176. The allegations of paragraph 176 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary,

the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

177. The allegations of paragraph 177 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

178. The allegations of paragraph 178 of Plaintiffs' Complaint are not directed to the responding defendant and contain legal conclusions to which no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

179. The allegations of paragraph 179 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

180. The allegations of paragraph 180 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

181. The allegations of paragraph 181 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

182. The allegations of paragraph 182 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary,

the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

183. The allegations of paragraph 183 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

184. The allegations of paragraph 184 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

185. The allegations of paragraph 185 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

186. The allegations of paragraph 186 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

187. The allegations of paragraph 187 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.



188. The allegations of paragraph 188 of Plaintiffs' Complaint are not directed to the responding defendant and contain legal conclusions to which no response is required. To the extent a response is deemed necessary, the Lt. Governor denies the allegations.

189. The allegations of paragraph 189 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

190. The allegations of paragraph 190 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

191. The allegations of paragraph 191 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

192. The allegations of paragraph 192 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

193. The allegations of paragraph 193 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary,

the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

194. The allegations of paragraph 194 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

195. The allegations of paragraph 195 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

196. The allegations of paragraph 196 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

197. The allegations of paragraph 197 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

198. The allegations of paragraph 198 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

199. The allegations of paragraph 199 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

200. The allegations of paragraph 200 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

201. Admitted that Governor Cox signed HB2004 in November 2021. The Lt. Governor lacks sufficient information to admit or deny the remaining allegations of paragraph 201 of Plaintiffs' Complaint.

202. The allegations of paragraph 202 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

203. The Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

204. The allegations of paragraph 204 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

205. The allegations of paragraph 205 of Plaintiffs' Complaint are not directed to the responding defendant and contain legal conclusions to which no response is required. To the extent a response is deemed necessary, the Lt. Governor denies the allegations.

206. The allegations of paragraph 206 of Plaintiffs' Complaint are not directed to the responding defendant and thus no response is required. To the extent a response is deemed necessary, the Lt. Governor denies that 1,431,777 votes were cast statewide across all four districts and admits that 61% of the votes cast were for a Republican candidate while 35% of the votes cast were for a Democrat candidate. The Lt. Governor lacks sufficient information to

admit or deny the remaining allegations of paragraph 206 of Plaintiffs' Complaint, and therefore denies the same.

207. The allegations of paragraph 207 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 207 of Plaintiffs' Complaint, and therefore denies the same.

208. The allegations of paragraph 208 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

209. The allegations of paragraph 209 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 209 of Plaintiffs' Complaint, and therefore denies the same.

210. The allegations of paragraph 210 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

211. The allegations of paragraph 211 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 211 of Plaintiffs' Complaint, and therefore denies the same.

212. The allegations of paragraph 212 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

213. The allegations of paragraph 213 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary,

the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 213 of Plaintiffs' Complaint, and therefore denies the same.

214. The allegations of paragraph 214 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 214 of Plaintiffs' Complaint, and therefore denies the same.

215. The allegations of paragraph 215 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 215 of Plaintiffs' Complaint, and therefore denies the same.

216. The allegations of paragraph 216 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 216 of Plaintiffs' Complaint, and therefore denies the same.

217. The allegations of paragraph 217 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

218. The allegations of paragraph 218 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor denies the allegations.

219. The allegations of paragraph 219 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

220. The allegations of paragraph 220 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

221. The allegations of paragraph 221 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

222. The allegations of paragraph 222 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 222 of Plaintiffs' Complaint, and therefore denies the same.

223. The allegations of paragraph 223 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

224. The allegations of paragraph 224 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 224 of Plaintiffs' Complaint, and therefore denies the same.

225. The allegations of paragraph 225 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 225 of Plaintiffs' Complaint, and therefore denies the same.

226. The allegations of paragraph 226 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 226 of Plaintiffs' Complaint, and therefore denies the same.

227. The allegations of paragraph 227 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 227 of Plaintiffs' Complaint, and therefore denies the same.

228. The allegations of paragraph 228 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

229. The allegations of paragraph 229 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

230. The allegations of paragraph 230 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

231. The allegations of paragraph 231 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

232. The allegations of paragraph 232 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 232 of Plaintiffs' Complaint, and therefore denies the same.

233. The allegations of paragraph 233 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 233 of Plaintiffs' Complaint, and therefore denies the same.

234. The allegations of paragraph 234 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary,

the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 234 of Plaintiffs' Complaint, and therefore denies the same.

235. The allegations of paragraph 235 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 235 of Plaintiffs' Complaint, and therefore denies the same.

236. The allegations of paragraph 236 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 236 of Plaintiffs' Complaint, and therefore denies the same.

237. The allegations of paragraph 237 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 237 of Plaintiffs' Complaint, and therefore denies the same.

238. The allegations of paragraph 238 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

239. The allegations of paragraph 239 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

240. The allegations of paragraph 240 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 240 of Plaintiffs' Complaint, and therefore denies the same.



241. The allegations of paragraph 241 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 241 of Plaintiffs' Complaint, and therefore denies the same.

242. The allegations of paragraph 242 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 242 of Plaintiffs' Complaint, and therefore denies the same.

243. The allegations of paragraph 243 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

244. The allegations of paragraph 244 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 244 of Plaintiffs' Complaint, and therefore denies the same.

245. The allegations of paragraph 245 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 245 of Plaintiffs' Complaint, and therefore denies the same.

246. The allegations of paragraph 246 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 246 of Plaintiffs' Complaint, and therefore denies the same.

247. The allegations of paragraph 247 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 247 of Plaintiffs' Complaint, and therefore denies the same.

248. The allegations of paragraph 248 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 248 of Plaintiffs' Complaint, and therefore denies the same.

249. The allegations of paragraph 249 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 249 of Plaintiffs' Complaint, and therefore denies the same.

250. The allegations of paragraph 250 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 250 of Plaintiffs' Complaint, and therefore denies the same.

251. The allegations of paragraph 251 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 251 of Plaintiffs' Complaint, and therefore denies the same.

252. The allegations of paragraph 252 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary,

the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 252 of Plaintiffs' Complaint, and therefore denies the same.

253. The allegations of paragraph 253 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 253 of Plaintiffs' Complaint, and therefore denies the same.

254. The allegations of paragraph 254 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor denies the allegations.

255. The allegations of paragraph 255 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 255 of Plaintiffs' Complaint, and therefore denies the same.

256. The allegations of paragraph 256 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor lacks sufficient information to admit or deny the allegations of paragraph 207 of Plaintiffs' Complaint, and therefore denies the same.

## **CAUSES OF ACTION**

### **Count One**

257. The Lt. Governor incorporates by reference the previous paragraphs as if fully stated herein.

258. The allegations of paragraph 258 of Plaintiffs' Complaint contain legal conclusions to which no response is required. The Utah Constitution speaks for itself.

259. The allegations of paragraph 259 of Plaintiffs' Complaint contain legal conclusions to which no response is required. The Utah Constitution speaks for itself.

260. The allegations of paragraph 260 of Plaintiffs' Complaint contain legal conclusions to which no response is required. The U.S. and Utah Constitutions speak for themselves.

261. The allegations of paragraph 261 of Plaintiffs' Complaint contain legal conclusions to which no response is required. The Utah Constitution speaks for itself.

262. Denied.

263. The allegations of paragraph 263 of Plaintiffs' Complaint contain legal conclusions to which no response is required. To the extent a response is deemed necessary, the Lt. Governor the Lt. Governor lacks sufficient information to either admit or deny the allegations in this paragraph and therefore denies the same.

264. The allegations of paragraph 264 of Plaintiffs' Complaint contain legal conclusions to which no response is required. The Utah Constitution speaks for itself.

265. Denied.

266. Denied.

267. Denied.

268. Denied.

269. Denied.

## **Count Two**

270. The Lt. Governor incorporates by reference the previous paragraphs as if fully stated herein.

271. Denied.

272. The allegations of paragraph 272 of Plaintiffs' Complaint contain legal conclusions to which no response is required. The Utah Constitution speaks for itself.

273. The allegations of paragraph 273 of Plaintiffs' Complaint contain legal conclusions to which no response is required. The Utah Constitution speaks for itself.

274. Denied.

275. The allegations of paragraph 275 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

276. Denied.

277. Denied.

278. The allegations of paragraph 278 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

279. The allegations of paragraph 279 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

280. The allegations of paragraph 280 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required.

281. Denied.

282. Denied.

### **Count Three**

283. The Lt. Governor incorporates by reference the previous paragraphs as if fully stated herein.

284. The allegations of paragraph 284 of Plaintiffs' Complaint contain legal conclusions to which no response is required. The Utah Constitution speaks for itself.

285. The allegations of paragraph 285 of Plaintiffs' Complaint contain legal conclusions to which no response is required. The Utah Constitution speaks for itself.

286. The allegations of paragraph 286 of Plaintiffs' Complaint contain legal conclusions to which no response is required. The Utah Constitution speaks for itself.

287. The allegations of paragraph 287 of Plaintiffs' Complaint contain legal conclusions to which no response is required. The U.S. and Utah Constitutions speak for themselves.

288. Denied.

289. Denied.

290. Denied.

291. Denied.

292. Denied.

293. Denied.

294. Denied.

295. Denied.

296. Denied.

297. Denied.

#### **Count Four**

298. The Lt. Governor incorporates by reference the previous paragraphs as if fully stated herein.

299. The allegations of paragraph 299 of Plaintiffs' Complaint contain legal conclusions to which no response is required. The Utah Constitution speaks for itself.

300. The allegations of paragraph 300 of Plaintiffs' Complaint contain legal conclusions to which no response is required.

301. The allegations of paragraph 301 of Plaintiffs' Complaint contain legal conclusions to which no response is required. The Utah Constitution speaks for itself.

302. The allegations of paragraph 302 of Plaintiffs' Complaint contain legal conclusions to which no response is required. The Utah Constitution speaks for itself.

303. The allegations of paragraph 303 of Plaintiffs' Complaint contain legal conclusions to which no response is required.

304. Denied.

305. Denied.

306. Denied.

307. Denied.

308. Denied.

309. Denied.

#### **Count Five**

310. The Lt. Governor incorporates by reference the previous paragraphs as if fully stated herein.

311. The allegations of paragraph 311 of Plaintiffs' Complaint contain legal conclusions to which no response is required. The Utah Constitution speaks for itself.

312. The allegations of paragraph 312 of Plaintiffs' Complaint contain legal conclusions to which no response is required. The Utah Constitution speaks for itself.

313. The allegations of paragraph 313 of Plaintiffs' Complaint contain legal conclusions to which no response is required. The Utah Constitution speaks for itself.

314. The allegations of paragraph 314 of Plaintiffs' Complaint contain legal conclusions to which no response is required. The Utah Constitution speaks for itself.

315. Denied.

316. The allegations of paragraph 316 of Plaintiffs' Complaint are not directed to the responding defendant thus no response is required. To the extent a response is deemed necessary, the Lt. Governor denies the allegations.

317. Denied.

318. Denied.

319. Denied.

### **THIRD DEFENSE**

The Lt. Governor denies each and every allegation in the Complaint unless it is expressly admitted herein.

### **FOURTH DEFENSE**

Plaintiffs' claims are non-justiciable under the political question doctrine.

### **FIFTH DEFENSE**

Plaintiffs' claims are non-justiciable because they are not ripe.



**SIXTH DEFENSE**

The relief Plaintiffs request, if granted, would violate the separation of powers doctrine.

**SEVENTH DEFENSE**

Lt. Governor Henderson preserves and does not waive any of the affirmative defenses set forth in Rule 8(c) of the Utah Rules of Civil Procedure, as discovery may reveal to be applicable, or any other matter constituting an avoidance or affirmative defense as they may become known in the future.

DATED: May 2, 2022.

OFFICE OF THE UTAH ATTORNEY GENERAL

*/s/ Lance F. Sorenson*

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DAVID N. WOLF  
LANCE F. SORENSON  
JEFFREY B. TEICHERT  
Assistant Utah Attorneys General  
*Counsel for Defendant Lieutenant Governor  
Deidre Henderson*

**ELECTRONIC FILING CERTIFICATE**

I hereby certify that on this 2<sup>nd</sup> day of May 2022, I electronically filed the foregoing, **LIEUTENANT GOVERNOR DEIDRE HENDERSON’S ANSWER TO PLAINTIFFS’ COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF**, with the Clerk of the Court by using the electronic filing system which will send a notice of electronic filing to the following:

David C. Reymann  
Briggs Matheson  
PARR BROWN GEE & LOVELESS  
[dreymann@parrbrown.com](mailto:dreymann@parrbrown.com)  
[bmatheson@parrbrown.com](mailto:bmatheson@parrbrown.com)

Troy L. Booher\*  
J. Frederic Voros, Jr.\*  
Caroline Olsen\*  
ZIMMERMAN BOOHER  
[tbooher@zbappeals.com](mailto:tbooher@zbappeals.com)  
[fvoros@zbappeals.com](mailto:fvoros@zbappeals.com)  
[colsen@abappeals.com](mailto:colsen@abappeals.com)

Mark Gaber  
Hayden Johnson  
Aseem Mulji  
Annabelle Harless  
CAMPAIGN LEGAL CENTER  
[mgaber@campaignlegalcenter.org](mailto:mgaber@campaignlegalcenter.org)  
[hjohnson@campaignlegalcenter.org](mailto:hjohnson@campaignlegalcenter.org)  
[amulji@campaignlegalcenter.org](mailto:amulji@campaignlegalcenter.org)  
[aharless@campaignlegalcenter.org](mailto:aharless@campaignlegalcenter.org)

*Counsel for Plaintiffs*

\*Served via email

John Fellows\*  
Thomas Vaughn\*  
Eric Weeks\*  
Michael Curtis\*  
UTAH STATE LEGISLATURE  
GENERAL COUNSEL  
[jfellows@le.utah.gov](mailto:jfellows@le.utah.gov)  
[tomvaughn@le.utah.gov](mailto:tomvaughn@le.utah.gov)  
[eweeks@le.utah.gov](mailto:eweeks@le.utah.gov)  
[michaelcurtis@le.utah.gov](mailto:michaelcurtis@le.utah.gov)

*Counsel for Defendants Utah State  
Legislature, Utah Legislative Redistricting  
Committee, Senator Scott Sandall,  
Representative Brad Wilson, and Senator J.  
Stuart Adams*

*/s/ Jenelle Daley*  
Paralegal