

Holly C. Wells
Mara E. Michaletz
William D. Falsey
Birch Horton Bittner & Cherot
510 L Street, Suite 700
Anchorage, Alaska 99501
hwells@bhb.com
mmichaletz@bhb.com
wfalsey@bhb.com
Telephone: 907.276.1550
Facsimile: 907.276.3680

Attorneys for Plaintiffs Felisa Wilson, George Martinez, and Yarrow Silvers

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT ANCHORAGE

In the Matter of the
2021 REDISTRICTING PLAN.

Case No. 3AN-21-08869CI

AFFIDAVIT OF SEAN MURPHY

STATE OF ALASKA)
) ss:
Third Judicial District)

I, Sean Murphy, being first duly sworn on oath, depose and state as follows:

1. I am a resident of House District 22-Eagle River Valley under the promulgated 2021 redistricting plan.

2. I came to Alaska while serving in the Army. I met my wife in 1989 and we started a family in East Anchorage. We moved to Eagle River with two daughters 22 years ago. I am a retired Anchorage School District educator and administrator. We

enjoy our time with two grandchildren who live in the Matanuska-Susitna Borough with their parents.

3. I am testifying on behalf of the East Anchorage Plaintiffs because I feel very strongly, as an Eagle River resident and an active volunteer in promoting the interests of Eagle River, that Eagle River districts should be paired with one another and our unified and very independent community preserved.

4. The Eagle River community is a unique unified community with interests and priorities that do not align with the very separate Muldoon community.

5. Based upon my personal experience and knowledge, the physical separation between Eagle River Valley and South Muldoon Road is very real. Not only are these two areas separated by about 15 miles and a stretch of highway, two bodies of water (a creek and Eagle River) and a sizeable valley, there is no way to get from here to there, or vice versa, without going through another district. Eagle River is our own community, boxed in between JBER and the Chugach Range and separated from Anchorage with the only bridge on the highway system that connects North Alaska and South Alaska. This connection is part of Eagle River's culture and commerce, but not at all a part of East Anchorage.

6. Eagle River Valley and South Muldoon are very different places socially. It is my opinion that Eagle River residents are generally more affluent and educated per capita than East Anchorage and that Eagle River residents have the same or very similar religious beliefs, which can be seen in Eagle River's many long-standing churches. It is also my opinion and my observation that Eagle River's churches are attended by Eagle River residents, not residents of South Muldoon.

7. Eagle River has its own commercial and cultural center. The store owners rely upon Eagle River resident shoppers, out-of-state tourists, and customers traveling from Anchorage to the Valley. Eagle River businesses do not rely upon South Muldoon customers.

8. Unlike Anchorage, Eagle River commerce continues to grow and thrive, even during the pandemic. Eagle River's response to the pandemic and its mitigation efforts were very different than South Muldoon. When Governor Dunleavy passed a mandate telling Alaskans to "hunker down," Eagle River residents were told to stay in Eagle River because Eagle River is our community; it is where we shop, play, and live.

9. I am also very proud of the clubs, organizations, festivals, and activities that Eagle River sponsors and maintains. We have an Eagle River Elks Club, a VFW, and a Lions Club. It is Eagle River residents that support and rely on these clubs, not residents of South Muldoon.

10. Culturally our community is different with its own Chamber of Commerce. We have the Bear Paw Festival during the summer. Boy Scouts still put up USA flags on our downtown strip. We are on the Iditarod historic trail, where the original dogs ran serum to Nome over the Crow Creek Pass from Girdwood to the Eagle River Science Center at the end of Eagle River Valley, almost. The holidays bring us the Merry Merchant Munch which has a long history of highlighting our local Eagle River businesses.

11. Economically, we have more land to develop than Anchorage. We have a separate Parks and Rec Department with its own budget separate from Anchorage. We have a private partnership with a local company to maintain roads. Most of our communities are covered by a volunteer fire department. Our homeowners love their

larger properties. While Eagle River residents live in housing that includes large lots, zero lot lines, and apartments, Eagle River does not have many trailer parks or homeless camps.

12. The Eagle River commerce and industry is growing and very diverse and businesses often come to Eagle River to separate from downtown Anchorage.

13. We have six Eagle River area Community Councils, the majority of which are very active in promoting and preserving the interests and needs of Eagle River residents.

14. I thought Anchorage and Eagle River were separated and different before I even realized it. I would explain to family and friends visiting from all over, who voiced their disbelief when I explained our communities out here are all under the Municipality of Anchorage.

15. Our school's communities have different needs. I saw this first-hand as an educator in Eagle River and then as an administrator on the east side of Anchorage. Take a walk through Chugiak or Eagle River high schools, then walk through Bartlett High School. The needs are different.

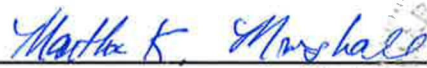
16. As an administrator on the east side and a resident in Eagle River, I saw road maintenance was different. My personal neighborhood in Eagle River is plowed and clean within a day or two at most. The streets around my walking only school on the east side would be a week or more before they were cleared. We have different needs than East Anchorage.

FURTHER YOUR AFFIANT SAYETH NAUGHT: --

DATED this 4 day of January, 2022.


Sean Murphy

SUBSCRIBED AND SWORN TO before me this 4th day of January, 2022.


Notary Public in and for Alaska
My Commission expires: 4-5-2024



CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 5th day of January, 2022, a true and correct copy of the foregoing document was served electronically on the following:

Matthew Singer
Lee C. Baxter
Kayla J.F. Tanner
Schwabe Williamson & Wyatt
msinger@schwabe.com
lbaxter@schwabe.com
ktanner@schwabe.com

Thomas Flynn
Cheryl Burghart
State of Alaska
thomas.flynn@alaska.gov
cheryl.burghart@alaska.gov

Nathaniel Amdur-Clark
Whitney A. Leonard
Sonosky, Chambers, Sachse, Miller &
Monkman, LLP
nathaniel@sonosky.net
whitney@sonosky.net

Stacey C. Stone
Gregory Stein
Holmes Weddle & Barcott, P.C.
sstone@hwb-law.com
gstein@hwb-law.com

Robin Brena
Laura S. Gould
Jake W. Staser
Jack Wakeland
Brena, Bell & Walker, P.C.
rbrena@brenalaw.com
lgould@brenalaw.com
jstaser@brenalaw.com
jwakeland@brenalaw.com

Eva Gardner
Michael Schechter
Benjamin J. Farkash
Ashburn & Mason, P.C.
eva@anchorlaw.com
mike@anchorlaw.com
ben@anchorlaw.com

BIRCH HORTON BITTNER & CHEROT

By: *Peggy S. Crowe*
Believed to be transmitted without error
from *pcrowe*@bhb.com
Approx Time: *3:30 pm*