

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA  
EASTERN DIVISION**

ELIZABETH JANE SINNER, WHITNEY  
OXENDAHL, CAROL SAWICKI, LOIS  
ALTENBURG, and NORTH DAKOTA  
VOTERS FIRST,

*Plaintiffs,*

v.

AL JAEGER, in his official capacity as  
Secretary of State of North Dakota,

*Defendant.*

Case No. 3:20-cv-00076

**BRIEF IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY  
INJUNCTION**

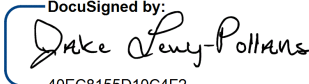
**EXHIBIT 23**  
Declaration of Jacob Levy-Pollans

### DECLARATION OF JACOB LEVY-POLLANS

1. I currently serve as Vice President, Strategic Services for Trilogy Interactive LLC. Trilogy Interactive is a company that provides various services including website design, website administration, and user experience engineering. I have been with Trilogy since June 2015.
2. Trilogy Interactive LLC has the capability to develop a web portal using the DocuSign platform. Currently, Trilogy is developing web portals for electronic signature gathering in Michigan, Massachusetts, and Ohio. Screen shots of a web portal and electronic signature form for an initiative in Michigan is attached to this declaration.
3. By using the DocuSign platform and a Trilogy Interactive web portal, North Dakota Voters First would be able to collect secure and verifiable electronic signatures.
4. Trilogy Interactive LLC has the capability to customize the required fields on the web portal to ensure that electors provide the same information required for wet signatures under North Dakota law: residential address or complete rural route or general delivery address, and the city, state, and zip code of the signer. *See* N.D. Cent. Code Ann. § 16.1-01-10.
5. The DocuSign platform can be customized to allow electors to “trace” their signature, rather than type a signature.
6. It is my understanding that DocuSign is then able to produce signed data in any desired format, including printed and pdf depending on the needs of the party requesting the documentation.

I declare under penalty of perjury that the foregoing statements are true and correct. Executed on

5/7/2020

, by   
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Jacob Levy-Pollans