

**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 21

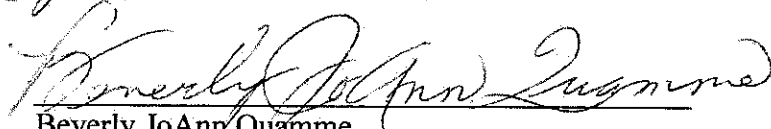
Declaration of Beverly JoAnn Quamme

DECLARATION OF BEVERLY JOANN QUAMME

1. My name is Beverly JoAnn Quamme and I reside in Sheyenne Crossings, an assisted living facility in West Fargo, North Dakota 58078 with my husband. I am 81 years old, and I have lived in North Dakota my entire life. Before we moved to Sheyenne Crossings last year, my husband and I lived in a home we built in Fargo for 53 years. We are both retired educators.
2. Two and a half years ago, my husband was diagnosed with stage IV cancer. We decided to move to Sheyenne Crossings because my husband requires additional assistance because of his health. Sheyenne Crossings offers three kinds of residential facilities: assisted living apartments, nursing home care, and memory care. We reside in the assisted living apartments with approximately 130 other people.
3. Voting and civic engagement are very important to me and have long been a huge part of my life. I cast my first vote in 1960—as soon as I was old enough—and I have voted in every election I could since. I have been a delegate to every state party convention since 1972 and served as a delegate for North Dakota in two national party conventions. Additionally, I served two eight-year terms as a district chair of my local party. I vote on ballot measures that come before me as a voter, and I have signed petitions to get measures onto the ballot. When I moved to Sheyenne Crossings, I largely stepped back from this work, but I believe it would be impossible to do the kind of political organizing I used to engage in because of the COVID-crisis.
4. I believe that fair maps are very important. I would like to sign North Dakota Voters First petition, but I will not be able to do so because of the COVID-19 pandemic.
5. Many people in Sheyenne Crossings, like my husband, have underlying health conditions that increase the risk that COVID-19 could be severely harmful to their health or even fatal. In an effort to keep COVID-19 out of our community, Sheyenne Crossings has completely banned third party visitation and recommends that no one leave their unit. All common spaces are closed, and they bring meals to our rooms. Previously, if I wanted groceries, my daughter could pick them up and bring them to Sheyenne Crossings. Then, when she arrived, I could go to the first floor to see my daughter from afar. She would pass the groceries to staff member who would walk with me to carry them upstairs. Starting May 2, 2020, residents are no longer allowed to go downstairs for this purpose. The groceries now can only be delivered by staff. There would be no way for me to sign a petition unless someone on staff at Sheyenne Crossings were to agree to be a petition circulator.
6. If I could sign North Dakota Voters First's petition to get their proposed measure on the ballot, I would. I would like to vote for North Dakota Voters First's proposed ballot measure this November.

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

May 5, 2020, by


Beverly JoAnn Quamme