

Exhibit B

DECLARATION OF LAURA HALE

Exhibit B

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Sondra Cosgrove, Douglas Goodman, and
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**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

* * * * *

FAIR MAPS NEVADA, a Nevada
political action committee, SONDRA
COSGROVE, DOUGLAS GOODMAN,
and ROBERT MADONALD,

Case No.: 3:20-cv-00271-MMD-WGC

Plaintiffs,

**DECLARATION OF LAURA HALE
IN SUPPORT OF PLAINTIFFS'
REPLY BRIEF FOR
PRELIMINARY INJUNCTION**

v.

BARBARA CEGAVSKE, in her official
capacity as Nevada Secretary of State,
JOSEPH P. GLORIA, in his official
capacity as Clark County Registrar of
Voters, DEANNE SPIKULA, in her
official capacity as Washoe County
Registrar of Voters, KRISTINA
JAKEMAN, in her official capacity as
Elko County Clerk, SADIE SULLIVAN,
in her official capacity as Lander County
Clerk, LACEY DONALDSON, in her
official capacity as Pershing County
Clerk-Treasurer, VANESSA STEVENS,
in her official capacity as Storey County
Clerk-Treasurer, NICHOLE BALDWIN,
in her official capacity as White Pine
County Clerk, SANDRA MERLINO, in
her official capacity as Nye County Clerk,
TAMMI RAE SPERO, in her official
capacity as Humboldt County Clerk,
KATHY LEWIS, in her official capacity

as Douglas County Clerk-Treasurer, LINDA ROTHERY, in her official capacity as Churchill County Clerk-Treasurer, LACINDA ELGAN, in her official capacity as Esmeralda County Clerk-Treasurer, LISA C. LLOYD, in her official capacity as Lincoln County Clerk, LISA HOEHNA, in her official capacity as Eureka County Clerk, CHRISTOPHER NEPPER, in his official capacity as Mineral County Clerk-Treasurer, NIKKI BRYAN, in her official capacity as Lyon County Clerk-Treasurer, and AUBREY ROWLATT, in her official capacity as Carson City Clerk-Recorder,

Defendants.

I, Laura Hale, declare as follows:

1. I am over the age of eighteen (18) years. I have personal knowledge of the matters contained in this declaration except where stated upon information and belief, and as to those matters, I believe them to be true. I make this declaration in support of Plaintiffs' Motion for Temporary Restraining Order and Preliminary Injunction ("Motion").
2. I am a resident of Carson City, Nevada. I am an officer of the Political Action Committee for Fair Maps Nevada, on behalf of Indivisible Northern Nevada.
3. Fair Maps is a Nevada Committee for Political Action Advocating Passage or Defeat of a Ballot Question registered pursuant to NRS 294A.230. Fair Maps' address is PO Box 751271, Las Vegas, Nevada 89136.
4. On May 5, 2020, I signed a Declaration in Support of Plaintiff's Motion for Preliminary Injunction in this case. I hereby restate that Declaration and offer additional information in response to allegations that Plaintiffs have not diligently pursued signature gathering efforts with respect to Amended Initiative Petition C-02-2019 (the "Initiative").

1 5. Fair Maps did not solicit signatures for the Initiative prior to January 7, 2020. There was
2 a very logical reason for that decision. A prior version of the Initiative was filed with the Secretary
3 of State on November 4, 2019. Shortly thereafter, litigation was filed in the district court for
4 Carson City alleging that the description of effect attached to the initiative was misleading (the
5 “State Case”).

6
7 6. All signature gathering efforts were halted while litigation proceeded in the State Case.
8 There were two primary reasons for the decision to suspend signature gathering efforts. First, if
9 the either the district court or the Nevada Supreme Court changed a single word on the description
10 of effect, such a change would render the initiative defective and require an amended initiative to
11 be filed. Any signatures gathered on the defective initiative could not be used to qualify the
12 amended initiative. Second, many interested financial supporters of the Initiative were hesitant
13 to donate while litigation was pending. For these reasons, Fair Maps made the perfectly
14 reasonable decision to defer signature gathering efforts until the district court litigation concluded.

15
16 7. Fair Maps’ decision turned out to be the right decision, as the district court modified the
17 description of effect on the original initiative in the State Case. After the description of effect was
18 modified pursuant to the district court’s order, Fair Maps filed the Initiative with the Secretary of
19 State on January 7, 2020. The plaintiffs in the State Case (who also happen to be one of the parties
20 and the same counsel currently seeking to intervene in this case), despite prevailing before the
21 district court, appealed to the Nevada Supreme Court in an obvious effort to further delay signature
22 gathering efforts. This appeal, while without merit and an abuse of the legal process in Fair Maps’
23 opinion, continued to cast uncertainty on signature gathering and related fundraising efforts.
24 Nonetheless, Fair Maps believed that the appeal would be processed expeditiously by the Nevada
25 Supreme Court and that signature gathering efforts would commence promptly after a final order.
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1 Unfortunately, the appeal of the State Case remains pending today before the Nevada Supreme
2 Court despite efforts by Fair Maps to expedite the appeal.

3 8. Frustrated with delays on the appeal, Fair Maps began the process of gathering signatures
4 using only grassroots efforts and word-of-mouth and gathered approximately 10,000 signatures
5 between the middle of January 2020 and the beginning of March 2020.

6
7 9. Encouraged by the rapidly growing interest in the Initiative, Fair Maps consulted with
8 political professionals experienced with signature gathering efforts on initiative petitions in order
9 to amplify signature gathering efforts. Fair Maps was determined and able to hire a professional
10 signature gathering consultant beginning in early April 2020. Fair Maps was advised by
11 professionals experienced with signature gathering efforts that the requisite number of qualifying
12 signatures could be obtained and I have no doubt that under normal circumstances Fair Maps
13 would have retained a professional consultant and been able to obtain the requisite signatures to
14 qualify the Initiative by June 24, 2020. Unfortunately, and as set forth in my Declaration of May
15 5, 2020, Fair Maps' signature gathering efforts came to a halt as the COVID-19 virus spread and
16 governmental orders and related health concerns effectively ended traditional signature gathering
17 efforts.
18

19 10. I declare under penalty of perjury that the foregoing is true and correct.

20 Dated: May 19, 2020

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22 
23 LAURA HALE

24 4839-5279-9675, v. 1