

**PARR BROWN GEE & LOVELESS**

David C. Reymann (Utah Bar No. 8495)  
Cheylynn Hayman (Utah Bar No. 9793)  
Kade N. Olsen (Utah Bar No. 17775)  
101 South 200 East, Suite 700  
Salt Lake City, UT 84111  
(801) 532-7840  
dreymann@parrbrown.com  
chayman@parrbrown.com  
kolsen@parrbrown.com

**ZIMMERMAN BOOHER**

Troy L. Booher (Utah Bar No. 9419)  
J. Frederic Voros, Jr. (Utah Bar No. 3340)  
Caroline Olsen (Utah Bar No. 18070)  
341 South Main Street  
Salt Lake City, UT 84111  
(801) 924-0200  
tbooher@zbappeals.com  
fvoros@zbappeals.com  
colsen@zbappeals.com

*Attorneys for Plaintiffs*

**CAMPAIGN LEGAL CENTER**

Mark P. Gaber\*  
Aseem Mulji\*  
Benjamin Phillips\*  
Isaac DeSanto\*  
1101 14th Street NW, Ste. 400  
Washington, DC 20005  
(202) 736-2200  
mgaber@campaignlegalcenter.org  
amulji@campaignlegalcenter.org  
bphillips@campaignlegalcenter.org  
idesanto@campaignlegalcenter.org

Annabelle Harless\*  
55 W. Monroe Street, Ste. 1925  
Chicago, IL 60603  
aharless@campaignlegalcenter.org

*\*Admitted Pro Hac Vice*

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

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

Plaintiffs,

v.

UTAH STATE LEGISLATURE, et al.,

Defendants.

**WITHDRAWAL OF PLAINTIFFS'  
MOTION FOR LEAVE TO FILE  
FOURTH SUPPLEMENTAL  
COMPLAINT AND PLAINTIFFS'  
MOTION FOR PRELIMINARY  
INJUNCTION ON COUNT XXII OF  
THEIR FOURTH SUPPLEMENTAL  
COMPLAINT**

Case No. 220901712

Honorable Dianna Gibson

Based on the withdrawal (Ex. 1 hereto) by the sponsors of the “indirect initiative” application that is the subject of the pleadings described below, Plaintiffs hereby withdraw the following:

1. Plaintiffs’ Motion for Leave to File Fourth Supplemental Complaint, filed October 15, 2025 (Dkt. 577, 578); and

2. Plaintiffs’ Motion for Preliminary Injunction on Count XXII of Their Fourth Supplemental Complaint, filed October 15, 2025 (Dkt. 579).

This withdrawal is without prejudice as to the merits of the issues discussed in the withdrawn motions.

RESPECTFULLY SUBMITTED this 27th day of October 2025.

/s/ David C. Reymann

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Troy L. Booher  
J. Frederic Voros, Jr.  
Caroline Olsen

*Attorneys for Plaintiffs*

# **EXHIBIT 1**



Ryan Cowley <ryancowley@utah.gov>

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## Formal withdrawal of indirect initiative

1 message

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Fri, Oct 24, 2025 at 3:33 PM

[REDACTED]  
To: "ryancowley@utah.gov" <ryancowley@utah.gov>, elections@utah.gov

Ryan,

Please consider this the official notice of withdrawal for the indirect initiative previously submitted on October 14th.

We are withdrawing this effort prior to initiating a direct initiative effort on the same issue.

Thank you,

Robert Axson

on behalf of the other signatories and Utahns for Representative Government.