

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RAMSEY

SECOND JUDICIAL DISTRICT

Case Type: Civil Other/Ballot Omission  
Declaratory Judgment

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Bruce Clark, Peter Butler, and Ann Dolan,

Honorable Leonardo Castro

Petitioners,

v.

Case No. 62-cv-19-857

City of Saint Paul, Minnesota;

and

Shari Moore, in her official capacity  
Saint Paul City Clerk;

**RESPONDENTS' NOTICE OF  
MOTION AND MOTION TO  
STAY PENDING APPEAL**

and

Joseph Mansky, in his official  
capacity Ramsey County Elections  
Manager,

Respondents.

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**NOTICE OF MOTION**

PLEASE TAKE NOTICE that on a date to be determined, at the Ramsey County Courthouse, 15 Kellogg Boulevard West, Saint Paul, Minnesota 55102, Respondents will bring the following Motion to Stay the Court's Order dated May 30, 2019 before the Honorable Leonardo Castro, Judge of Ramsey County District Court.

**MOTION**

Upon all the files, records, proceedings, and accompanying memorandum herein, Respondents move for an order setting forth relief as follows:

1. Pursuant to Minn. R. Civ. P. 62.03 and Minn. R. Civ. App. P. 108.02, subd. 1, Respondents move the Court for an order staying the effect of the Court's order dated May 30, 2019, until 90 days after all appellate review has been completed and the mandate of the Appellate Courts has issued.

Respondents request this motion be heard on an expedited basis, pursuant to Minn. R. Gen. P. 115.07, and that a hearing on this motion take place as soon as the Court may be available.

Dated: June 13, 2019

LYNDSEY M. OLSON  
SAINT PAUL CITY ATTORNEY

*s/ Megan D. Hafner*

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*Attorneys for Respondents*

**MINN. STAT. § 549.211  
ACKNOWLEDGMENT**

The party or parties on whose behalf the attached document is served acknowledge through their undersigned counsel that sanctions may be imposed pursuant to Minn. Stat. § 549.211.

*s/ Megan D. Hafner*  
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MEGAN D. HAFNER, #293751  
Assistant City Attorney