

**STATE OF MINNESOTA**  
**IN SUPREME COURT**

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Bruce Clark, Peter Butler, and Ann Dolan,

Respondents,

v.

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

and

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

Petitioners/Appellants.

Judge Leonardo Castro  
District Court File No. 62-CV-19-857  
Appellate Case No. A19-0916

**UNOPPOSED MOTION FOR  
EXPEDITED CONSIDERATION OF  
PETITION FOR ACCELERATED  
REVIEW**

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Petitioners, the City of St. Paul, Shari Moore, and Joseph Mansky, respectfully request that this Court issue an Order agreeing to consider the Petition for Accelerated Review in this case (filed June 13, 2019) on an expedited basis either at or before the Court's next Special Term. Petitioners have confirmed that Respondents do not oppose this request. The reasons for this request are briefly set forth below.

The district court Order at issue on this appeal directs the City of St. Paul to suspend City Ordinance 18-39 concerning organized trash collection and to include a referendum of the ordinance on the November 5, 2019, General Election Ballot. As explained in the Petition for Accelerated Review, August 23, 2019, is the last day the City can provide the referendum question to the county election official for inclusion on

the November ballot. *See* Minn. Stat. § 205.16. Accordingly, time is of the essence on this appeal.

Petitioners therefore request that this Court agree to consider the Petition for Accelerated Review on an expedited basis. *See Sayer v. Minn. Dep't of Transp.*, No. A07-2118 (11/21/07 Order) (“[T]he motion of petitioners Scott Sayer, et al., for expedited consideration of their petition for accelerated review be, and the same is, granted.”).) In the event the Court grants the Petition, Petitioners request that the Court issue a briefing schedule that will allow the matter to be fully briefed and decided by August 23, 2019.<sup>1</sup>

**BASSFORD REMELE**  
***A Professional Association***

Date: June 21, 2019

By s/ Mark R. Bradford  
Mark R. Bradford (#335940)  
David E. Camarotto (#176849)  
Kerri J. Nelson (#386920)  
100 South 5th Street, Suite 1500  
Minneapolis, MN 55402  
Telephone: (612) 333-3000  
[mbradford@bassford.com](mailto:mbradford@bassford.com)  
[dcamarotto@bassford.com](mailto:dcamarotto@bassford.com)  
[knelson@bassford.com](mailto:knelson@bassford.com)

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<sup>1</sup> The Petition for Accelerated Review proposed a briefing schedule under which Appellants' brief would be due Monday, June 24, 2019. The parties agree that proposed schedule is no longer feasible.