

STATE OF MINNESOTA  
SPECIAL REDISTRICTING PANEL  
A21-0243  
A21-0546

**FILED**

May 17, 2022

OFFICE OF  
APPELLATE COURTS

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Peter S. Wattson, Joseph Mansky, Nancy  
B. Greenwood, Mary E. Kupper, Douglas  
W. Backstrom, and James E. Hougas III,  
individually and on behalf of all citizens  
and voting residents of Minnesota  
similarly situated, and League of Women  
Voters Minnesota,

Plaintiffs,

and

Paul Anderson, Ida Lano, Chuck Brusven,  
Karen Lane, Joel Hineman, Carol  
Wegner, and Daniel Schonhardt,

Plaintiff-Intervenors

vs.

Steve Simon, Secretary of State of  
Minnesota; and Kendra Olson, Carver  
County Elections and Licensing Manager,  
individually and on behalf of all  
Minnesota county chief election officers,

Defendants,

and

Frank Sachs, Dagny Heimisdottir,  
Michael Arulfo, Tanwi Prigge, Jennifer  
Guertin, Garrison O'Keith McMurtrey,  
Mara Lee Glubka, Jeffrey Strand, Danielle  
Main, and Wayne Grimmer,

Plaintiffs,

and

Dr. Bruce Corrie, Shelly Diaz, Alberder  
Gillespie, Xiongpaoo Lee, Abdirazak  
Mahboub, Aida Simon, Beatriz Winters,  
Common Cause, OneMinnesota.org, and  
Voices for Racial Justice,

Plaintiff-Intervenors,

vs.

Steve Simon, Secretary of State of  
Minnesota,

Defendant.

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**SACHS PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES**

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Pursuant to the Order issued by the Special Redistricting Panel (the “Panel”) on May 2, 2022, Plaintiffs Frank Sachs, Dagny Heimisdottir, Michael Arulfo, Tanwi Prigge, Jennifer Guertin, Garrison O’Keith McMurtrey, Mara Lee Glubka, Jeffrey Strand, Danielle Main, and Wayne Grimmer (the “Sachs Plaintiffs”) hereby submit this motion for an award of their reasonable attorneys’ fees totaling \$383,305.

The Sachs Plaintiffs’ motion is based on the accompanying memorandum in support of its motion, the Declaration of Charles N. Nauen and the Declaration of Ben Stafford, and supporting documents attached thereto, and upon all the files, records, and proceedings herein.

Dated: May 17, 2022

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Respectfully submitted,

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

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**ATTORNEYS FOR PLAINTIFFS FRANK SACHS; DAGNY HEIMISDOTTIR;  
MICHAEL ARULFO; TANWI PRIGGE; JENNIFER GUERTIN;  
GARRISON O'KEITH MCMURTREY; MARA LEE GLUBKA; JEFFREY STRAND;  
DANIELLE MAIN; AND WAYNE GRIMMER**