

IN THE SUPREME COURT OF THE STATE OF ALASKA

In the Matter of the)	
)	Supreme Ct. No. S-18332
2021 Redistricting Plan.)	
)	Superior Court Case No.
)	3AN-21-08869 CI
)	

**SKAGWAY-VALDEZ’S RESPONSE TO
BOARD’S EMERGENCY MOTION FOR RECONSIDERATION
OF ORDER CONVERTING APPEAL TO PETITION**

The Municipality of Skagway Borough and Brad Ryan and the City of Valdez and Mark Detter (collectively “Skagway-Valdez”), through their counsel, Brena, Bell & Walker, P.C., hereby respond to the Emergency Motion for Reconsideration of Order Converting Appeal to Petition (“Motion”) filed by the Alaska Redistricting Board in accordance with this Court’s Order of this same date.

Skagway-Valdez agree with and join in the logic of the Motion insofar as all the issues being appealed by the parties from the superior court decision should be deemed final for purposes of appellate review—i.e., the superior court’s decision “completely disposes of the redistricting challenges”¹—and the extent to which the redistricting map may change under the remand directed by the superior court will not affect the issues being appealed. Skagway-Valdez request that all filed appeals from the superior court’s order be consolidated and proceed with the scheduling conference under Appellate Rule 216.5(c), so this matter may proceed as efficiently as possible under the expedited and compressed timeframe with equal treatment for all parties.

**BRENA, BELL &
WALKER, P.C.**
810 N Street, Suite 100
Anchorage, AK 99501
Phone: (907) 258-2000
Fax: (907) 258-2001
www.brenalaw.com

¹ Motion at 4.

Alternatively, and at a minimum, Skagway-Valdez request the Court amend its orders converting the appeals to petitions in accord with the past practice of expanding the standard petition rules with regard to filing time, page limit, focus of content, excerpts, consolidation, and scheduling of these matters, in order for all the issues on appeal to be sufficiently and equally addressed in the filings before this Court.²

RESPECTFULLY SUBMITTED this 18th day of February, 2022.

BRENA, BELL & WALKER, P.C.
Counsel for Appellants MUNICIPALITY OF
SKAGWAY BOROUGH and BRAD RYAN,
CITY OF VALDEZ and MARK DETTER

By //s// Robin O. Brena

Robin O. Brena, AK Bar No. 8410089
Jake W. Staser, AK Bar No. 1111089
Laura S. Gould, AK Bar No. 0310042
Jon S. Wakeland, AK Bar No. 0911066
810 N Street, Suite 100
Anchorage, Alaska 99501
Phone: (907) 258-2000
Fax (907) 258-2001
Email: rbrena@brenalaw.com
jstaser@brenalaw.com
lgould@brenalaw.com
jwakeland@brenalaw.com

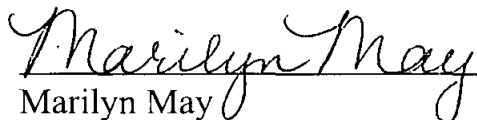
**BRENA, BELL &
WALKER, P.C.**
810 N Street, Suite 100
Anchorage, AK 99501
Phone: (907) 258-2000
Fax: (907) 258-2001
www.brenalaw.com

² See Exhibit 1, Order in *In Re 2001 Redistricting Cases*, S-10504 (Feb. 5, 2002).

5. Petitions and responses may not exceed 25 pages and must comply with Appellate Rule 513.5.
6. Although Appellate Rule 210 normally does not apply to petitions for review, the parties must submit excerpts of record in accordance with AR 210(c). In addition, the parties must submit an "executive excerpt," containing only those record materials (transcripts, documents, and exhibits) most critical to the court's understanding and accurate resolution of the petitions. The executive excerpt should, if possible, not exceed 250 pages.
7. Parties must submit an original and twelve copies of all documents filed with the court.
8. Service must satisfy the requirements of Appellate Rule 216.5(k).
9. Parties may discuss, in their petitions or responses, whether this court should vacate the superior court's 2/01/02 stay of its decision remanding in part to the Alaska Redistricting Board.
10. All petitions from the 2/01/02 memorandum and order are consolidated for consideration by this court. The caption shall be as set out above. All petitions and responses will be assigned Supreme Court Case No. S-10504.
11. The clerk of the appellate courts will conduct the mandatory scheduling conference on Thursday, 2/7/02 at 10:00 a.m. in the supreme court conference room (come to 303 K Street, 4th floor). Counsel for all parties or amici curiae in the superior court who intend to participate in the petitions are expected to attend the scheduling conference. Counsel outside of Anchorage may contact Cheryl Jones of the appellate clerk's office at 264-0608 to arrange a conference call.

Entered at the direction of the court.

Clerk of the Appellate Courts


Marilyn May

Distribution:

Philip R. Volland
Volland & Taylor
211 H Street
Anchorage AK 99501

Kenneth P Jacobus
Attorney at Law
425 G Street #920
Anchorage AK 99501

Robert Blasco
Robertson Monagle & Eastaugh, PC
P O Box 21211, 801 W. 10th St. Ste 300
Juneau AK 99802

Douglas J Serdahely
Patton Boggs LLP
1031 West Fourth Avenue #504
Anchorage AK 99501

Kyle Parker
Patton Boggs L.L.P.
1031 W 4th Ave Ste 504
Anchorage AK 99501

Michael D White
Patton Boggs LLP
1031 West 4th Avenue Suite 504
Anchorage AK 99501

Thomas F. Klinkner
Birton Horton Bittner & Cherot
1127 West 7th Avenue
Anchorage AK 99501

Joseph N. Levesque
Walker Walker & Associates
550 W. 7th Avenue #1850
Anchorage AK 99501

William M Walker
Walker Walker and Associates, LLC
550 W 7th Ave Suite 1850
Anchorage AK 99501

Charles E Cole
Law Office of Charles Cole
406 Cushman Street
Fairbanks AK 99701

James Baldwin
Asst Attorney General
P O Box 110300
Juneau AK 998110300

Jeffrey M Feldman
Feldman & Orlansky
500 L Street #400
Anchorage AK 99501

Kenneth P. Eggers
Groh Eggers LLC
3201 C Street
Anchorage, AK 99502-3967

Ardith Lynch, Borough Attorney
P.O. Box 71267
Fairbanks, AK 99707

Myra M. Munson
Sonosky, Chambers, Sachse, Miller & Munson
318 Fourth Street
Juneau, AK 99801