

Ayden Richards  
Plaintiff Counsel  
133 East Ford Canyon Drive  
Centerville, Utah 84014

ASUU SUPREME COURT

Kaden Madson,	)	Case No.: 20180200
Plaintiff,	)	
v.	)	
ASUU Elections Board,	)	<b>Plaintiff Writ</b>
Defendant	)	

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It is the belief of the now disqualified "Madson Ticket" that the elections committee took it upon themselves, and wrongfully disqualified Kaden Madson from running to serve as the University of Utah ASUU Student Body President. It is this purpose of this hearing to reinstate Kaden Madson as a candidate for Student Body President.

Dated this 5th day of December, 2018



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Counsel for the Plaintiff

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Plaintiff, )  
v. )  
ASUU Elections Board, ) **Plaintiff Writ Argument**  
Defendant )

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**Argument**

**I. Reasoning to appear before the ASUU Supreme Court does meet the requirements necessary for doing so.**

Bylaws Article III, Section 3, Clause 2.1, a student filing for complaint to the Supreme Court must meet standing before the court based on meeting each of the following criteria:

1. That they have been "substantially injured"
2. That the injury was directly caused by an action of the defendant
3. That the defendant's action is not mandated by Redbook and the defendant's discretion to take the action either wasn't committed to them by Redbook or they have abused their discretion by taking the action.

The Plaintiff meets these qualifications based on the following:

1. Kaden Madson has been "substantially injured". Based off of the recognition that Kaden Madson had started to build his campaign team and focus his campaign efforts. Disqualifying him has no longer allowed the candidate to make a strategically timed announcement to the public that he is running, and has halted all campaign efforts that were being planned to take place in the future. All efforts regarding the campaign have since had to be focused on the fact that Mr. Madson was disqualified, and that he must be put back on the ticket.
2. The Elections Director directly caused this injury, as they oversee the candidates in an election. Therefore, the removal

of Mr. Madson from the ballot was a direct injury from the Elections Director.

3. The actions taken by the defendant were out of order, as Kaden Masdon should not have been removed from the Presidential Election as he is allowed to run for the office of ASUU Student Body President at the University of Utah.

**II. The official Executive Candidate Packet states that January 25, 2019 at 5:00pm is the official filing deadline.**

1. According to the ASUU Executive 2018-2019 Candidate Packet as approved by the following ASUU officials: Caroline Ranger (Elections Registrar), Audrey Stegman, and Abby Feenstra. According to Article IV, Section 1, Clause 3 of Redbook:
  - a. The President, Vice President of University Relations, and Vice President of Student Relations must each have completed forty-five (45) college semester credit hours or equivalent prior to the elections filing deadline.  
(*Emphasis added*)
2. One would not be wrong to assume that January 25, 2019 at 5:00pm is the official filing deadline as stated on page six (6) of the official Executive Candidate Packet. In no other area does it make the specific specifications to a time and date of the filing deadline in alignment with previous packets.
3. Kaden Madson will have met the necessary forty-five (45) college semester credit hour requirement by the filing deadline (January 25, 2019).
4. In the defendants motion to dismiss, previous election packets were used as evidence to point out previous filing deadline dates. However, in submitting the packets as evidence, the defense proved that ASUU abided by the most specific deadline provided in the packet; therefore there should be no reason do differ this year.
5. According to Redbook, Article V section 1.1-1.2:
  - a. "Once established and announced by the Elections Director, the Elections Director may not change the filing deadline unless the Supreme Court approves the change."

Being that the official Executive Candidate Packet was published in september with a filing deadline reading January 25, 2019 at 5:00pm and there is no other detailed date and time given, the elections board cannot have changed the deadline without having gotten the authority from the ASUU Supreme Court. The packet being published therefore means that it was

announced and approved by the Elections Registrar, Deputy  
Elections Registrar and the Legislative Advisor therefore means  
it was established.

Dated this 5th day of December, 2018

A handwritten signature in black ink that reads "Ayden Richards". The signature is written in a cursive style with a horizontal line underneath it.

Ayden Richards  
Counsel for the Plaintiff

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ASUU SUPREME COURT

Kaden Madson,	)	Case No.: 20180200
Plaintiff,	)	
v.	)	
ASUU Elections Board,	)	<b>EVIDENCE IN SUPPORT OF</b>
Defendant	)	<b>THE PLAINTIFF</b>

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I Hereby submit the following evidence to the court:

1. 2018-2019 Executive Election Packet
2. 2018-2019 Legislative Election Packet
3. 2017-2018 Executive Election Packet
4. 2017-2018 Legislative Election Packet
5. Correspondence Between Abby Feenstra and Kaden Madson (Sent from Abby Feenstra on 11-16-2018)
6. Defense, Motion to Dismiss

Dated this 5th day of December, 2018

  
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Ayden Richards  
Counsel for the Plaintiff