1	IN THE SUPREME COURT OF THE STATE OF ALASKA		
2	1,151617181920		
3	In re 2011 Redistricting Cases )		
4	In re 2011 Redistricting Cases  In re 2011 Redistricting Cases  RECEIVED  Appellate Courts of the State of Alaska  State of Alaska		
5	Trial Court No. 4FA 11 2200CI		
6	- 1500 gc		
7	MOTION AND MEMORANDUM IN SUPPORT OF LEAVE TO		
8	PARTICIPATE AS AMICI CURIAE BY AHTNA, INC.		
9	ALASKA FEDERATION OF NATIVES		
10	THE ALEUT CORPORATION		
11	BERING STRAITS NATIVE CORPORATION BRISTOL BAY NATIVE CORPORATION		
	FIRST ALASKANS INSTITUTE		
12	KONIAG, INC. MTNT, LTD. (McGRATH, TAKOTNA, NICOLAI and TELIDA VILLAGE		
13	CORPORATIONS) and		
14	TANANA CHIEFS CONFERENCE		
15			
16	Pursuant to Alaska Rule of Appellate Procedure 212(9) and this Court's		
17			
18	order of February 8, 2012, the above Native corporations and organizations hereby		
19	request an order allowing them to participate as amici curiae in this proceeding. <sup>1</sup>		
20	Amici are a diverse group of Native corporations and organizations who		
21	share a common mission to improve the quality of life for the people in their		
22	share a common mission to improve the quarty of the feet are people at the		
23			
	1 Amicus Bristol Bay Native Corporation submitted an amicus brief at the Superior		
24	Court focused primarily on due process issues, but they do not raise these issues on appeal.		
25			
26	MOTION TO PARTICIPATE AS AMICI CURIAE  In re 2011 Redistricting Cases  Page 1 of 5  Case No. S-14441		
27			

1	respective regions. <sup>2</sup> Each corporation here listed serves as a leader on voting			
2	issues for the people of their respective regions.			
3	The Alaska Federation of Natives (AFN) is the largest statewide Nativ			
4 5	organization in Alaska. Its membership includes 178 federally recognized tribe			
6	and village corporations, 13 regional Native corporations and 12 regional nonprofit			
7	and tribal consortia. Its stated mission is "to enhance and promote the cultural			
8	economic and political voice of the entire Alaska Native community."3 First			
9	Alaskans Institute is a non-profit charitable organization whose mission is to			
10 11	"[a]dvance Alaska Natives through community engagement, information an			
12				
13				
14	2 Each amicus has a website describing their mission and relationship to their			
15	membership: AHTNA, Inc: <a href="http://www.ahtna-inc.com/about_ahtna.html">http://www.ahtna-inc.com/about_ahtna.html</a> ;			
16	The Aleut Corporation: <a href="http://www.aleutcorp.com/index.php?option=com">http://www.aleutcorp.com/index.php?option=com</a> content&view=section&layout			
17	<u>=blog&amp;id=1&amp;Itemid=2;</u>			
18	Bering Straits Native Corporation: <a href="http://www.beringstraits.com/">http://www.beringstraits.com/</a> ; Bristol Bay Native			
19	Corporation: <a href="http://www.bbnc.net/index.php?option=com_content&amp;view=category&amp;layout=blog&amp;id=4&amp;Itemid=7">http://www.bbnc.net/index.php?option=com_content&amp;view=category&amp;layout=blog&amp;id=4&amp;Itemid=7</a> ;			
20	Koniag, Inc.:			
21	http://www.koniag.com/wp-content/uploads/2011/11/KON092-Core-Values-Poster v4-FINAL-LR.pdf			
22	MTNT, Ltd.: <a href="http://www.mtnt.net/aboutus.html">http://www.mtnt.net/aboutus.html</a> Tanana Chiefs Conference: <a href="http://www.tananachiefs.org/history_tcc.shtm">http://www.tananachiefs.org/history_tcc.shtm</a>			
23	(all visited February 16, 2012).			
24	3 See <u>www.nativefederation.org</u> (visited February 16, 2012).			
25				
26	MOTION TO PARTICIPATE AS AMICI CURIAE  In re 2011 Redistricting Cases  Page 2 of 5 Case No. S-14441			
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1	research, collaboration and research development." <sup>4</sup> Both of these organizations		
2	were heavily involved in the redistricting process and provided seminars and		
3	information sessions for their members.		
4	All Amici represent members of the protected class of Alaska Natives and		
5	accordingly share an interest in ensuring that the mandates of the Voting Rights Ac		
6			
7	of 1965 (as amended 1975) are followed and properly applied to the redistricting		
8	process. Amici submit the attached memorandum not to advocate for one result or		
10	one plan over another; rather Amici are concerned that the superior court has		
11	committed two very significant legal errors in its conclusions number 7 and 8		
12	regarding the importance of avoiding the unnecessary pairing of minority		
13	incumbents. Amici reviewed the petitions for review filed by the parties and		
14	discovered that neither has briefed this issue for this court. Accordingly, Amici		
15			
16	respectfully request that the court allow them to participate as amici curiae and		
17	accept the memorandum on the mandates of Sections 2 and 5 of the Voting Rights		
18 19	Act filed herewith.		
20	DATED this 17 <sup>th</sup> day of February, 2012		
21	By:		
22	Natalie Landreth		
23	NATIVE AMERICAN RIGHTS FUND		
24	4 See <u>www.firstalaskans.org</u> (visited February 17, 2012).		
25	MOTION TO PARTICIPATE AS AMICI CURIAE Page 3 of 5		
26	In re 2011 Redistricting Cases Case No. S-14441		

In re 2011 Redistricting Cases

1	Alaska Bar No. 0405020
2	Attorney for:
3	AHTNA, INC. ALASKA FEDERATION OF NATIVES
4	THE ALEUT CORPORATION
5	BERING STRAITS NATIVE CORPORATION
6	BRISTOL BAY NATIVE CORPORATION
7	FIRST ALASKANS INSTITUTE KONIAG, INC.
8	MTNT, LTD.(McGRATH, TAKOTNA,
9	NICOLAI and TELIDA village corporations) TANANA CHIEFS CONFERENCE
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26	MOTION TO PARTICIPATE AS AMICI CURIAE  In re 2011 Redistricting Cases  Page 4 of Section 1.1444.
27	

1	Certificate of Service		
2 3 4	I hereby certify that on the 17 <sup>th</sup> day of February 2012, a true and correct copy of the foregoing document was served upon each of the following by first class mail and electronic mail:		
5 6 7 8	Michael J. Walleri 2518 Riverview Drive Fairbanks, AK 99709 walleri@gci.net Attorney for Plaintiffs	Michael D. White PATTON BOGGS LLP 601 W. 5 <sup>th</sup> Ave., Suite 700 Anchorage, AK 99501 mwhite@pattonboggs.com Attorney for Defendant ARB	
9 10 11	Thomas F. Klinker BIRCH HORTON BITTNER & CHEROT 1127 w. 7 <sup>TH</sup> Ave. Anchorage, AK 99501	Scott A. Brandt-Erickson Ketchikan Gateway Borough 1900 1 <sup>st</sup> Ave., Suite 215 Ketchikan, AK 99901	
12 13 14 15	Rene Broker Fairbanks Northstar Borough 809 Pioneer Road Box 71267 Fairbanks, AK 99707	Joseph N. Levesque WALKER & LEVESQUE 731 N Street Anchorage, AK 99501	
16 17 18	By: Inathan Miggs  Jonathan Briggs		
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26 27	MOTION TO PARTICIPATE AS AMICI CURIAE  In re 2011 Redistricting Cases	Page 5 of 5 Case No. S-14441	

## IN THE SUPREME COURT OF THE STATE OF ALASKA 1 2 Supreme Court No. S-14441 3 In re 2011 Redistricting Cases ORDER 4 Allow Amici Curiae 5 RECEIVED 6 Date of Order: Trial Court No. 4FA-11-02209CI 7 8 ORDER GRANTING MOITON FOR LEAVE TO PARTI AS AMICI CURIAE BY 9 AHTNA, INC. 10 ALASKA FEDERATION OF NATIVES THE ALEUT CORPORATION 11 BERING STRAITS NATIVE CORPORATION BRISTOL BAY NATIVE CORPORATION 12 FIRST ALASKANS INSTITUTE 13 KONIAG, INC. MTNT, LTD. (McGRATH, TAKOTNA, NICOLAI and TELIDA VILLAGE 14 **CORPORATIONS)** and 15 TANANA CHIEFS CONFERENCE 16 On consideration of the February 17, 2012 motion to allow the above-named 17 18 organizations to participate as amici curiae, and the parties to the appeal having 19 indicated their non-opposition by telephone, 20 IT IS ORDERED: 21 22 The Motion is GRANTED. 23 Entered by direction of an individual justice. 24 25 Page 1 of 2 ORDER 26 Case No. S-14441 In re 2011 Redistricting Cases 27

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26	ORDER In re 2011 Redistricting Cases	Page 2 of 2 Case No. S-14441
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