

IN THE IOWA DISTRICT COURT IN AND FOR POLK COUNTY

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| ALEXANDRA “SONDRA” WILSON, Plaintiff, v. PAUL D. PATE, in his official capacity as Secretary of State of Iowa, Defendant. | Case No. EQCE092993 ORDER DENYING MOTION TO RECONSIDER |
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This matter comes before the Court on Plaintiff’s Motion to Reconsider under Iowa Rule of Civil Procedure 1.904(2), filed June 1, 2026. Plaintiff asks the Court to reconsider its May 28, 2026 Order denying her Emergency Petition for Equitable Extension of Ballot-Access Deadline. In support, she now presents three authorities not previously cited: *Rivas v. Brownell*, 18 N.W.3d 211 (Iowa 2025); *Mormann v. Iowa Workforce Development*, 913 N.W.2d 554 (Iowa 2018); and *Esshaki v. Whitmer*, 455 F. Supp. 3d 367 (E.D. Mich. 2020). The Court has reviewed the motion and the authorities presented.

The Court begins by acknowledging a premise in Plaintiff’s motion that is well-founded: Iowa courts possess equitable and supervisory authority to address extraordinary roadblocks to the exercise of legal rights. *Rivas v. Brownell* recognized that addressing such roadblocks through tolling mechanisms falls within the judicial power. *Mormann v. Iowa Workforce Development* confirms that equitable exceptions to limitations statutes are common in Iowa. 913 N.W.2d at 566. The Court does not dispute that equitable power of this kind exists. The May 28 Order did not rest on a conclusion that equitable authority is categorically unavailable. It rested on Plaintiff’s failure to identify a legal basis for extending the specific deadline at issue. The additional authorities do not bridge that gap.

Rivas and *Mormann* both address equitable tolling of statutes of limitations in civil proceedings. Statutes of limitations and statutory election deadlines serve materially different purposes. Statutes of limitations regulate the timeliness of litigation between private parties, and equity has long acted to relieve parties from their strict application in appropriate cases. Election deadlines, by contrast, serve the State's substantial interest in the orderly administration of elections and provide voters, other candidates, and election officials with certainty about who will appear on the ballot. The Iowa Supreme Court has not held that equitable tolling principles applicable to statutes of limitations apply with equal force to statutory ballot-access deadlines, and Plaintiff cites no authority so holding.

Esshaki v. Whitmer comes closer to the subject matter at hand, but it too is distinguishable on its facts. As Plaintiff describes it, a federal district court modified ballot-access signature requirements in response to extraordinary external restrictions that prevented candidates from gathering signatures in the customary way. Those restrictions arose from conditions entirely outside the control of any individual candidate and apparently affected all candidates alike. Whatever the precise nature of those restrictions, they represent a fundamentally different kind of burden from the one Plaintiff describes here. The burdens Plaintiff identifies did not arise from any external condition imposed on her. They arose from litigation she herself initiated.

Plaintiff filed the underlying lawsuit in case number LACV053674 in December 2023. The filing deadlines and hearings she identifies as interfering with her signature gathering are the ordinary and foreseeable demands of the litigation she chose to bring. The coexistence of a pending lawsuit and an approaching statutory deadline is not an extraordinary external circumstance.

Reduced to its practical substance, the Petition asks the Court to extend a statutory ballot-access deadline because Plaintiff was occupied with other matters during the signature-gathering period. The equitable power of this Court exists to address genuine injustice, not to relieve a party from the consequences of competing obligations she voluntarily undertook. The additional authorities Plaintiff now presents demonstrate that equitable power exists. They do not demonstrate that the power is appropriately exercised when the circumstance amounts, at its core, to a claim that other commitments prevented timely compliance with a known statutory deadline.

The Court recognizes the effort Plaintiff has invested in her candidacy and the sincerity of her commitment to participate in the 2026 election. Those considerations do not supply authority for this Court to set aside a deadline the General Assembly has established in Iowa Code chapter 44.

IT IS THEREFORE ORDERED that Plaintiff's Motion to Reconsider under Iowa Rule of Civil Procedure 1.904 is **DENIED**.

IT IS SO ORDERED.



State of Iowa Courts

Case Number
EQCE092993
Type:

Case Title
ALEXANDRA WILSON VS PAUL D PATE
OTHER ORDER

So Ordered

Scott J. Beattie, District Court Judge,
Fifth Judicial District of Iowa

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