

IN THE IOWA DISTRICT COURT IN AND FOR POLK COUNTY

ALEXANDRA “SONDRA” WILSON,	)	
	)	
<i>Plaintiff,</i>	)	Case No. _____
	)	
<i>v.</i>	)	In Equity
	)	
PAUL D. PATE, in his official capacity as	)	
Secretary of State of Iowa	)	
<i>Defendant</i>	)	
	)	
_____	)	

PLAINTIFF’S MOTION TO RECONSIDER UNDER IOWA R. CIV. P. 1.904(2)

Plaintiff Alexandra “Sondra” Wilson respectfully moves the Court to reconsider its May 28, 2026 Order denying Plaintiff’s Emergency Petition for Equitable Extension of Ballot-Access Deadline. Plaintiff submits that additional authority and equitable doctrines relevant to the relief requested were not previously presented to the Court and that reconsideration is appropriate under Iowa Rule of Civil Procedure 1.904(2).

I. Additional Iowa Authority Supports Equitable Relief Under Extraordinary Circumstances

1. The Court’s May 28, 2026 Order concluded that Plaintiff had not articulated a legal basis for the equitable relief requested. Plaintiff respectfully submits that additional Iowa authority concerning equitable tolling, supervisory authority, and extraordinary circumstances was not previously presented.

2. Reconsideration is appropriate where material legal authority relevant to the issues presented was not previously before the Court and where clarification of the legal framework may materially affect resolution of the matter.

3. Iowa courts recognize that statutory deadlines are not categorically immune from equitable modification under extraordinary circumstances. In *Rivas v. Brownell*, No. 23-1829 (Iowa Feb. 28, 2025), the Iowa Supreme Court held that addressing extraordinary roadblocks to the exercise of legal rights through tolling statutes of limitations falls within the judicial power and the Iowa Supreme Court’s supervisory and administrative authority. The Court further recognized that “equitable exceptions to limitations statutes are common in Iowa.” See also *Mormann v. Iowa Workforce Development*, 913 N.W.2d 554, 566 (Iowa 2018).

4. Plaintiff recognizes that these authorities arise in differing procedural contexts. Plaintiff nevertheless respectfully submits that they collectively demonstrate that Iowa courts possess equitable and supervisory authority to provide narrowly tailored relief where extraordinary circumstances outside a diligent party’s control substantially interfere with timely compliance and where rigid enforcement would result in substantial injustice.

5. Plaintiff does not seek invalidation of Iowa Code chapter 44, nor generalized authority for courts to disregard election deadlines. Rather, Plaintiff seeks narrowly tailored equitable relief under extraordinary circumstances where ongoing litigation burdens substantially interfered with timely compliance despite demonstrated diligence and substantial efforts toward compliance.

II. Courts Have Granted Ballot-Access Relief Under Extraordinary External Circumstances

6. Courts addressing ballot-access restrictions have recognized that extraordinary external circumstances may justify modification of ballot-access requirements where strict enforcement would impose severe and unjustified burdens despite demonstrated diligence. See *Esshaki v. Whitmer*, No. 2:20-cv-10831 (E.D. Mich. 2020).

7. In *Esshaki*, the district court recognized that candidates who had exercised diligence in signature gathering were nevertheless prevented from timely compliance due to extraordinary external restrictions materially interfering with ballot-access activities. The court therefore granted narrowly tailored relief modifying ballot-access requirements in order to prevent otherwise viable candidates from being excluded from the ballot under extraordinary circumstances.

8. Plaintiff respectfully submits that the present case likewise involves extraordinary external burdens materially interfering with timely compliance despite substantial efforts toward compliance and diligent signature-gathering activity.

III. Reconsideration Is Appropriate Under Rule 1.904(2)

9. Plaintiff respectfully submits that reconsideration is appropriate because the Court's Order identified the absence of articulated legal authority supporting the requested relief, and Plaintiff has now identified additional Iowa authorities concerning equitable tolling, supervisory authority, and extraordinary circumstances that were not previously presented.

10. Plaintiff is not requesting reduction of signature requirements, waiver of statutory qualifications, or permanent modification of Iowa election law, but only a temporary extension sufficient to permit compliance.

11. Plaintiff respectfully requests that the Court reconsider its May 28, 2026 Order, permit filing of the attached Second Amended Petition incorporating the authorities identified herein, and grant such other relief as the Court deems just and equitable.

Executed on this 1st day of June, 2026.

Respectfully submitted,

/s/ Alexandra “Sondra” Wilson
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CERTIFICATE OF SERVICE

I certify that on June 1, 2026, I served a copy of this Motion to Reconsider, together with the accompanying Motion for Leave to Amend, Second Amended Petition, and supporting authorities, on Defendant Paul D. Pate, Secretary of State of Iowa, by email at IVoters.Support@sos.iowa.gov and sos@sos.iowa.gov.