

IN THE SUPREME COURT OF IOWA

ALEXANDRA “SONDRA” WILSON,)
)
 Petitioner-Appellant,) No. 26-1268
)
 v.)
)
PAUL D. PATE, in his official capacity as)
Secretary of State of Iowa)
)
 Respondent-Appellee)
_____)

**PETITIONER-APPELLANT’S STATEMENT ADDRESSING
APPELLATE JURISDICTION AND MOOTNESS**

Petitioner-Appellant Alexandra Wilson, appearing self-represented, submits this statement in response to the Court’s order directing her to address whether this appeal was timely filed and whether it is moot.

1. The appeal should not be dismissed.

2. First, the district court’s June 5, 2026 ruling materially modified the May 28 ruling by enlarging the basis for its original denial and adjudicating, for the first time, a dispositive factual and equitable issue: whether the litigation burdens described by Appellant were extraordinary or external, or instead arose from litigation she “chose to bring.” The May 28 ruling had expressly declined to reach considerations beyond Appellant’s failure to identify a sufficient legal basis for relief. (May 28, 2026 Order Denying Petition for Equitable Extension at 1, EQCE092993.)

3. Appellant’s June 17 motion was directed specifically at that intervening determination. It identified the June 5 characterization, explained that the completed Reliable Street filings had not existed when the June 5 order was entered, and supplied the factual record bearing directly upon the nature, scope, and necessity of those burdens. (Motion to Reconsider Based Upon

Subsequently Filed Evidence and Clarification of Factual Record at 1–5, filed June 17, 2026, EQCE092993.) The district court reviewed the motion, affidavit, and attached materials, stated that it had “again reconsidered its prior ruling,” and denied relief on June 22. (June 22, 2026 Order Denying Second Motion to Reconsider at 1, EQCE092993.) Appellant filed her notice of appeal twenty-eight days later, on July 20.

4. Second, the appeal is not moot because effective relief remains possible. Appellant continues to seek access to the November 2026 general-election ballot and asks this Court to reverse and remand for establishment of a workable equitable deadline permitting her to satisfy, rather than avoid, Iowa’s signature and county-distribution requirements.

5. Alternatively, the question falls within Iowa’s public-importance exception to mootness. Ballot-access controversies arise under compressed election calendars, are capable of repetition, and may routinely evade appellate review if expiration of the particular date requested below automatically forecloses review.

6. Appellant submits the attached articles as organized public-interest summaries identifying the electoral speech and reform proposals affected by the denial of relief and illustrating why the issues presented are public rather than exclusively private. Appellant does not offer those articles as substitutes for the district-court record, as independent proof of disputed jurisdictional facts, or as a request that this Court adjudicate the merits of the alleged abuse of process. The underlying filings, orders, and docketed materials remain the primary record supporting timeliness. To the extent the articles describe later developments relevant to mootness, an appellate court may consider matters technically outside the district-court record in determining whether a controversy remains live. See *Iowa Mut. Ins. Co. v. McCarthy*, 572 N.W.2d 537, 539 n.1 (Iowa 1997).

I. RELEVANT PROCEDURAL HISTORY

7. On May 27, 2026, Appellant filed an Emergency Petition for Equitable Extension of Ballot-Access Deadline. She requested an extension of the June 2 deadline to July 15, not a waiver or reduction of the requirement to collect 3,500 signatures. The petition alleged that hearings, filing deadlines, discovery obligations, and other court-imposed duties in *Wilson v. Reliable Street Inc., et al.*, No. LACV053674, directly overlapped with the statutory signature-gathering period. (May 28, 2026 Order Denying Petition for Equitable Extension at 1, EQCE092993.)

8. On May 28, the district court denied the petition at the threshold. The court found that Appellant had not identified “a statute, rule, or decision authorizing a court to extend the ballot-access deadline” and stated that “[b]ecause Plaintiff has not identified a legal basis for an equitable extension, she cannot show a likelihood of success on the merits, and the Petition fails at the threshold.” The court expressly added: “The Court does not reach the remaining considerations.” (Id. at 1.)

9. On June 1, Appellant filed a timely Motion to Reconsider under Iowa Rule of Civil Procedure 1.904(2), together with a Motion for Leave to Amend and an amended petition. She supplied additional authority, including *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). (Motion to Reconsider Under Iowa R. Civ. P. 1.904(2) at 1–3; Motion for Leave to Amend at 1, both filed June 1, 2026, EQCE092993.)

10. On June 5, the district court acknowledged that “Iowa courts possess equitable and supervisory authority to address extraordinary roadblocks to the exercise of legal rights” and that

“[t]he Court does not dispute that equitable power of this kind exists.” It nevertheless denied relief on a ground not reached in its May 28 order. (June 5, 2026 Order Denying Motion to Reconsider at 1, EQCE092993.)

11. The June 5 order found: “The burdens Plaintiff identifies did not arise from any external condition imposed on her. They arose from litigation she herself initiated.” It characterized those burdens as “the ordinary and foreseeable demands of the litigation she chose to bring” and concluded that equity did not exist “to relieve a party from the consequences of competing obligations she voluntarily undertook.” (Id. at 2–3.)

12. On June 17, Appellant filed a motion directed specifically at that newly articulated determination. The motion began by identifying the June 5 conclusion that the burdens arose from litigation she initiated and therefore were not extraordinary external burdens. It then explained that the completed Revised Second Amended Petition and Exhibits A–G had not existed when the June 5 ruling was entered and that those filings materially clarified the nature, scope, and necessity of the litigation. (Motion to Reconsider Based Upon Subsequently Filed Evidence and Clarification of Factual Record at 1–5, filed June 17, 2026, EQCE092993.)

13. On June 22, the district court stated that it had reviewed “the motion, the affidavit, and the attached materials,” had “again reconsidered its prior ruling,” and declined to alter it. (June 22, 2026 Order Denying Second Motion to Reconsider at 1, EQCE092993.)

14. Appellant filed her notice of appeal on July 20, 2026, twenty-eight days after entry of the June 22 order. (Notice of Appeal, filed July 20, 2026, EQCE092993.)

II. THE JUNE 17 MOTION WAS DIRECTED AT A MATERIAL MODIFICATION INTRODUCED BY THE JUNE 5 RULING

15. Iowa Rule of Appellate Procedure 6.101(1)(b) provides that when a timely motion under Iowa Rule of Civil Procedure 1.904(2) is filed, the notice of appeal must be filed within thirty days after the ruling on that motion.

16. Rule 6.101(1)(c) provides that, for purposes of calculating the appeal period, a motion is timely when it is filed by the applicable deadline and asks the district court to reconsider, enlarge, or amend its ruling. The rule further provides that whether the motion was otherwise “proper” does not affect its timeliness. It then states that a successive motion is not timely “unless the court has modified its order, ruling, judgment, or decree and the subsequent motion is directed only at the modification.” Iowa Rule of Civil Procedure 1.904(4) contains materially identical language.

17. The official comment explains: “To avoid controversies over whether a rule 1.904(2) motion tolls the time for appeal, rule 6.101 authorizes any timely rule 1.904(2) motion to extend the appeal deadline, subject to an exception for successive motions.”

18. Appellant does not contend that every successive reconsideration motion restarts the appeal period. Her position is narrower: the June 5 ruling materially modified the May 28 ruling by adjudicating a previously unreachd and dispositive issue, and the June 17 motion was directed only at that intervening determination.

A. The May 28 order denied relief at the threshold and expressly left the remaining considerations unresolved

19. *“Because Plaintiff has not identified a legal basis for an equitable extension, she cannot show a likelihood of success on the merits, and the Petition fails at the threshold. The Court does not reach the remaining considerations.”*

20. The May 28 order therefore did not decide whether Appellant’s litigation burdens were voluntary, foreseeable, external, extraordinary, or self-created. (May 28, 2026 Order at 1.)

B. The June 5 ruling adjudicated a previously unresolved factual and equitable issue

21. *“The burdens Plaintiff identifies did not arise from any external condition imposed on her. They arose from litigation she herself initiated.”*

22. *“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.”*

23. *“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.”*

24. Those determinations were not contained in the May 28 order. The earlier ruling had expressly declined to reach them. The operative denial remained in place, but the adjudicative basis of the ruling changed from a threshold absence-of-authority determination to a factual and equitable determination that the burdens were voluntary, foreseeable, and not external. (June 5, 2026 Order at 1–3.)

25. Neither Rule 6.101 nor the Iowa Code supplies a specialized definition of “modified.” Iowa Code section 4.1(38) directs that words and phrases be construed according to their context and approved usage, while technical terms are construed according to their legal meaning. The rule refers to modification of an “order” or “ruling,” not only a “judgment” or “decree.” Appellant respectfully submits that adjudicating a previously unreached and dispositive issue materially modified the ruling within the meaning and purpose of Rule 6.101(1)(c), even though the ultimate disposition remained a denial.

C. The legal effect of the June 17 filing depends upon its substance, not merely its title

26. The Court’s show-cause order describes the June 17 filing as a “second motion to reconsider.” That label accurately describes its sequence but does not fully describe its substance. Iowa courts examine the content and actual nature of a motion rather than relying exclusively on its title. See *Iowa Elec. Light & Power Co. v. Lagle*, 430 N.W.2d 393, 395–96 (Iowa 1988).

27. The June 17 motion was not simply a second request that the district court reconsider the same legal-authority issue raised on June 1. It opened by identifying the intervening June 5 determination and then supplied the factual record bearing directly upon that determination. (June 17 Motion at 1–5.)

D. The June 17 motion addressed a new determination rather than merely rearguing a previously rejected position

28. This case is unlike *Hedlund v. State*, 875 N.W.2d 720, 726–27 (Iowa 2016), where the postruling motion merely supplied additional authority for an argument the district court had already rejected and did not address a factual misconception or gap in the ruling.

29. Here, the June 17 motion addressed a factual determination first introduced in the June 5 order: that Appellant’s litigation burdens resulted from obligations she voluntarily undertook. The motion identified the incomplete factual record underlying that determination and supplied the subsequently completed materials bearing directly upon the nature and necessity of the litigation. (June 17 Motion at 1–5.)

30. Appellant recognizes that the “proper motion” doctrine applied in *Hedlund* was superseded by the current language of Rule 6.101(1)(c). She cites *Hedlund* only to distinguish repetitive reargument from a motion addressing a newly adjudicated factual issue. Compare *Hedlund*, 875 N.W.2d at 726–27, with *Sierra Club Iowa Chapter v. Iowa Department of*

Transportation, 832 N.W.2d 636, 641–42 (Iowa 2013) (recognizing a postruling motion directed at matters the original ruling had left unaddressed or unexplained).

31. *Tenney v. Atlantic Associates*, 594 N.W.2d 11, 13–14 (Iowa 1999), likewise supports examining the substance of what the motion asked the district court to decide, although *Tenney* involved a first postjudgment motion rather than a successive one.

E. Turner confirms that the decisive question is whether the later motion was confined to the intervening modification

32. *Turner v. CCRC of Cedar Rapids, LLC*, No. 20-0973, 2021 WL 3076742, at *2–3 (Iowa Ct. App. July 21, 2021), applied the requirement that a successive Rule 1.904(2) motion be “directed only at the modification.” In *Turner*, the subsequent motion sought numerous additional factual findings and expressly reasserted all prior requests for reconsideration. The court therefore held that it was not confined to the intervening modification.

33. This case presents the opposite procedural pattern. The June 17 motion began by identifying the precise June 5 conclusion it challenged and then directed its factual presentation to that conclusion. It did not renew all prior requests, seek unrelated additional findings, or invite wholesale reconsideration. Unlike the successive motion in *Turner*, the June 17 motion identified the intervening June 5 determination and directed its factual presentation to that determination. (June 17 Motion at 1–5.)

F. The June 17 motion was directed only at the new June 5 determination

34. The district court reviewed the June 17 motion, affidavit, and supporting materials and stated that it had “again reconsidered its prior ruling.” (June 22, 2026 Order at 1.) Under these circumstances, Appellant respectfully submits that the June 5 ruling materially modified the May 28 ruling by adjudicating a previously unreachd and dispositive issue; the June 17

motion was directed only at that issue; and the notice of appeal filed within thirty days of the June 22 disposition was timely under Rule 6.101(1)(b)–(c).

35. This interpretation also avoids an inequitable procedural result without dispensing with the rule’s text. Appellant sought reconsideration only after the district court introduced a previously unreached dispositive determination, directed her response to that determination, and filed her notice within thirty days after the district court disposed of that response. Treating the June 17 motion as categorically ineffective would require Appellant to have appealed before the court completed its consideration of the very determination the intervening ruling had introduced.

III. THE RELIABLE STREET BURDENS CANNOT FAIRLY BE REDUCED TO VOLUNTARY “OTHER COMMITMENTS”

36. Appellant does not ask this Court, at the jurisdictional stage, to adjudicate the underlying allegations of abuse of process, denial of discovery, or other misconduct. Those matters remain disputed and have not received a final merits adjudication.

37. The narrower point is that the June 17 materials directly addressed the newly introduced characterization that the litigation burdens were voluntary and self-created. Appellant alleged that serious accusations and misleadingly presented materials entered an Iowa civil-rights record; that the administrative complaint was closed without an investigation; that she initially lacked access to the complete submissions; and that overlapping administrative and limitations periods left her only fifty-five days to review the record and commence litigation without counsel. (June 17 Motion at 1–5 and attached affidavit at 6–7.)

38. The subsequent proceedings involved coordinated challenges to service, venue, pleading form, and claim sufficiency; dismissal requests before discovery; transfer and

fragmentation of the docket; withdrawal of a previously established evidentiary process; dismissals before meaningful discovery; repeated amendment disputes; unresolved discovery concerning authorship, drafting history, native files, metadata, chronology, and document preparation; summary-judgment proceedings; extensive amended pleadings and exhibits; hearings; and court-imposed filing deadlines. (Id. at 3–5.)

39. Appellant does not ask this Court to accept every underlying allegation as proven. She asks the Court to recognize that whether the burdens were genuinely self-created cannot be resolved merely from the fact that she was the named plaintiff. A person may initiate litigation while responding to circumstances she contends she did not create, including allegedly false governmental records, reputational injury, administrative failure, disputed document preparation, defensive motion practice, withheld discovery, and court-imposed deadlines.

40. The June 17 motion was the first filing directed specifically at the district court’s newly dispositive characterization of those burdens as voluntary and self-created. (Id. at 1–5.) Appellant has alleged in the Reliable Street litigation that certain procedural conduct constituted abuse of process and has sought leave to present that claim through an amended pleading. The district court denied leave to amend, and Appellant filed a consolidated motion to reconsider that ruling on July 30, 2026. Appellant does not ask this Court to adjudicate that disputed claim in this jurisdictional proceeding. Its limited relevance here is that the underlying record does not support treating the entire resulting burden as an ordinary personal commitment merely because Appellant initiated the action. Whether actionable abuse of process occurred remains adjudicated on its merits.

IV. THE CONTINUING LITIGATION BURDENS EXPLAIN THE PRACTICAL CHRONOLOGY BUT ARE NOT OFFERED AS AN INDEPENDENT SUBSTITUTE FOR JURISDICTION

41. The Reliable Street proceedings did not end when the June 2 ballot-access deadline passed. Appellant continued preparing and filing extensive materials, responding to dispositive motions, addressing unresolved discovery, seeking leave to amend, requesting reconsideration of adverse rulings, and attempting to preserve claims threatened with termination before trial.

42. Those continuing obligations also affected Appellant's ability to prepare an immediate appeal in *Wilson v. Pate*. Appellant does not rely upon workload, self-representation, exhaustion, or legal unfamiliarity as an independent basis to disregard a jurisdictional deadline. Nor does she concede that her notice of appeal was untimely and merely request that the delay be excused.

43. Her position remains that the appeal period ran from the June 22 disposition because the June 17 motion was directed at a material modification introduced by the June 5 ruling. The continuing burdens explain the practical chronology; they do not replace the Rule 6.101(1)(c) argument.

V. THE APPEAL IS NOT MOOT BECAUSE EFFECTIVE RELIEF REMAINS AVAILABLE

44. Appellant's objective has not expired. She continues to seek access to the November 2026 general-election ballot.

45. Her original petition requested an extension to July 15. Her amended petition requested July 23 because that was the practical date identifiable when it was filed. (May 28 Order at 1; Amended Emergency Petition for Equitable Extension of Ballot-Access Deadline at 1, filed June 1, 2026, EQCE092993.) The passing of those requested dates does not necessarily eliminate the underlying controversy: whether a court may equitably adjust the ballot-access timetable when extraordinary circumstances prevent compliance despite diligence.

46. Effective relief could include reversal and remand with instructions to establish, on an expedited basis and in consultation with applicable election-administration requirements, a revised deadline allowing Appellant to submit the same number and geographic distribution of signatures required by Iowa law.

47. Appellant does not request elimination of the signature requirement, reduction of the required number of signatures, reduction of the county-distribution requirement, or automatic placement on the ballot without qualification. She seeks additional time to satisfy those requirements after extraordinary litigation burdens substantially consumed and disrupted the period originally available.

48. The Secretary of State remains free to identify concrete administrative deadlines, ballot-certification requirements, printing constraints, or other operational considerations. Those matters may affect the timing or scope of relief, but they do not establish that no effective relief is legally or practically possible.

49. Iowa election law generally requires strict compliance with preelection qualification requirements. See *Gluba v. State Objection Panel*, 11 N.W.3d 459, 467–68 (Iowa 2024). Iowa law has also recognized that exceptional circumstances may affect application of otherwise mandatory election requirements. See *Wingert v. Urban*, 250 N.W.2d 731, 735 (Iowa 1977) (addressing a candidate’s reliance on erroneous advice from an election official). Appellant does not contend that *Wingert* creates a general right to disregard election statutes. It demonstrates only that Iowa election law has recognized a narrow exceptional-circumstances principle rather than treating every form of noncompliance as categorically incapable of equitable consideration.

VI. ALTERNATIVELY, THE CASE FALLS WITHIN IOWA’S PUBLIC-IMPORTANCE EXCEPTION TO MOOTNESS

50. Even if the Court concludes that the precise relief originally requested has become unavailable, the case presents a public question warranting review. “Mootness is not a question of power but rather one of restraint.” *Rush v. Ray*, 332 N.W.2d 325, 326 (Iowa 1983).

51. Under Iowa’s public-importance exception, the Court has discretion to decide an otherwise moot case when matters of public importance are presented and the problem is likely to recur. *Riley Drive Entertainment I, Inc. v. Reynolds*, 970 N.W.2d 289, 297–98 (Iowa 2022). In determining whether to apply the exception, the Court considers “(1) the private or public nature of the issue; (2) the desirability of an authoritative adjudication to guide public officials in their future conduct; (3) the likelihood of the recurrence of the issue; and (4) the likelihood the issue will recur yet evade appellate review.” *Id.* at 298.

A. The issue is public rather than merely private

52. The case concerns voter choice, independent and nonparty candidacy, the relationship between court-imposed burdens and statutory election deadlines, the judiciary’s equitable authority in extraordinary circumstances, the absence of an administrative extension mechanism, and whether candidates and voters can obtain meaningful appellate review before election deadlines expire. Exclusion of a candidate affects not only the candidate but also voters who wish to hear, support, consider, or reject that candidate’s platform.

B. Authoritative adjudication is desirable to guide candidates, election officials, and district courts

53. The May 28 and June 5 orders demonstrate uncertainty concerning the relationship between acknowledged equitable authority and statutory election deadlines. The May 28 order found no identified legal basis permitting relief. The June 5 order acknowledged that Iowa courts

possess equitable authority to address extraordinary roadblocks but concluded that Appellant's circumstances did not qualify. (May 28 Order at 1; June 5 Order at 1–3.)

54. Authoritative guidance is needed concerning whether Iowa courts may ever equitably modify a statutory ballot-access deadline, what standard governs such a request, what circumstances qualify as extraordinary or external, what degree of diligence is required, and what relief remains available when ordinary appellate review cannot occur before the requested date passes.

C. The issue is likely to recur

55. Iowa's statutory ballot-access deadlines recur every election cycle. Independent and nonparty candidates lack an identified administrative mechanism for obtaining an extension; Appellant's amended petition states that the Secretary of State's Office informed her that any extension would require a court order. (Amended Emergency Petition at 4.)

56. Future candidates may confront extraordinary circumstances involving serious illness, natural disaster, government action, court orders, administrative failure, official misinformation, or other conditions substantially interfering with ballot-access activity. Unlike the temporary and highly fact-dependent pandemic restrictions at issue in *Riley Drive*, the compressed election calendar and absence of an identified administrative extension procedure are structural features.

D. The issue is likely to recur yet evade appellate review

57. A candidate may file an emergency petition, receive an expedited district-court ruling, file a timely motion to reconsider, receive a second ruling, and pursue appellate review, yet still see the requested extension date pass before the appellate court can resolve the controversy.

58. The structural timing problem closely resembles the concern recognized in *Board of Directors of Independent School District v. Green*, 259 Iowa 1260, 1265, 147 N.W.2d 854, 856 (1967), where the Court acted because it was probable that a similar future dispute would become moot under ordinary standards before the Court could resolve it. See also *Rush*, 332 N.W.2d at 326–27.

59. A ballot-extension request presents the same structural problem: the requested date may expire before ordinary appellate briefing, submission, and review can occur. If expiration of the requested date automatically moots the appeal, Iowa appellate courts may rarely have an opportunity to decide whether equitable ballot-access relief is available or what legal standard governs such requests.

60. The absence of appellate guidance may also create a serious remedial gap. When governmental, judicial, or third-party conduct substantially interferes with a candidate’s ability to satisfy a ballot-access deadline, the compressed election calendar may cause both the requested relief and appellate review to expire before the underlying interference can be meaningfully examined. If no prospective standard is available, future candidates and voters may remain without an effective remedy even where extraordinary interference can be demonstrated. Authoritative guidance would therefore serve not only Appellant’s interests but also the integrity of future elections by clarifying when an extraordinary burden is legally cognizable, what proof is required, and what narrowly tailored relief remains available.

61. A rule under which interference can consume the compliance period while the passage of time simultaneously prevents judicial review could create perverse incentives and leave voter choice vulnerable to burdens for which no timely remedy exists.

VII. EXPEDITED REVIEW REMAINS AVAILABLE AND APPROPRIATE

62. This Court has demonstrated its ability to resolve ballot-access appeals on an expedited basis when election-administration deadlines require immediate action. In *Gluba v. State Objection Panel*, the Court retained the case, granted expedited review, and issued its opinion because candidate names had to be finalized by 11:59 p.m. the following day. 11 N.W.3d 459, 463–64 (Iowa 2024).

63. Appellant recognizes that *Gluba* also reaffirmed strict compliance with the nomination procedure at issue there. *Id.* at 467–68. She cites *Gluba* only to demonstrate that expedited appellate review is procedurally available when ballot-access questions require immediate resolution.

VIII. ATTACHED PUBLIC-INTEREST MATERIALS

64. The following materials are attached and clearly labeled for the limited purposes described in the introduction:

- Exhibit A — *Wilson v. Pate*: The Ballot-Extension Case.
- Exhibit B — *Iowa’s Broken Judiciary* (primary article).
- Exhibit C — Prologue: Iowa’s Civil-Rights Trap.
- Exhibit D — Part One: Procedural Bombardment.
- Exhibit E — Part Two: Sudden Reversal.
- Exhibit F — Part Three: Plausible Deniability.

65. The attached articles are publicly available through WildWillpower.org. The attached versions are submitted as fixed snapshots of those public-interest materials as they existed on the date of filing. They are offered to identify the electoral speech and reform proposals affected by

the denial of relief, to illustrate the public nature of the controversy, and to describe developments relevant to mootness. They are not offered as substitutes for the district-court record supporting timeliness or as independent proof of disputed allegations.

66. The filings and docketed orders remain the primary evidence of the litigation burden. The articles organize portions of that record for public understanding but do not purport to document every hour of research, factual reconstruction, exhibit review, drafting, formatting, filing, and service required by the overlapping proceedings.

67. Part Four, *Dangerous Precedent*, remains in preparation and is therefore not attached. The later Reliable Street developments relevant to this statement are established through the underlying filings, orders, and other docketed materials rather than through an unfinished public-facing article.

IX. REQUESTED DISPOSITION

1. determine that the June 5 ruling materially modified the May 28 ruling by adjudicating a previously unreached and dispositive issue, and that the June 17 motion was directed only at that modification;
2. determine that the July 20 notice of appeal, filed within thirty days of the June 22 ruling, was timely under Iowa Rule of Appellate Procedure 6.101(1)(b)–(c);
3. decline to dismiss the appeal as moot because effective relief remains available;
4. alternatively, retain and decide the appeal under Iowa’s public-importance and capable-of-repetition-yet-evading-review principles;
5. establish an expedited schedule for further proceedings; and
6. grant such other relief as the Court deems just and appropriate.

Respectfully submitted,

/s/ Alexandra Wilson

Alexandra “Sondra” Wilson

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CERTIFICATE OF SERVICE

I certify that on July 31, 2026, I electronically filed the foregoing
Petitioner-Appellant's Statement Addressing Appellate Jurisdiction and
Mootness, together with its attachments, through the Iowa Judicial Branch
Electronic Document Management System.

I further certify that on July 31, 2026, I transmitted courtesy copies by
email to the Iowa Secretary of State at sos@sos.iowa.gov and
IVoters.Support@sos.iowa.gov.

/s/ Alexandra Wilson
Alexandra "Sondra" Wilson