

IN THE SUPREME COURT OF IOWA

ALEXANDRA “SONDRA” WILSON,)

Petitioner-Appellant,)

v.)

PAUL D. PATE, in his official capacity as)

Secretary of State of Iowa)

Respondent-Appellee)

Supreme Court No. 26-1268

Polk County No. EQCE092993

**PETITIONER-APPELLANT’S MOTION FOR LEAVE TO FILE SUPPLEMENTAL
RESPONSE TO RESPONDENT’S JURISDICTIONAL STATEMENT AND REQUEST
FOR EXPEDITED CONSIDERATION**

**MATTER REQUIRING PROMPT CONSIDERATION: NOVEMBER 3, 2026 GENERAL
ELECTION**

Petitioner-Appellant Alexandra “Sondra” Wilson, appearing self-represented, respectfully requests leave to file the attached Proposed Supplemental Response to Respondent’s August 7, 2026 Statement Addressing Jurisdictional Issues and requests expedited consideration because the continuing passage of time directly affects the availability of meaningful election relief.

Grounds for Leave

1. Respondent’s August 7 statement advances a specific and potentially dispositive interpretation of Iowa Rule of Appellate Procedure 6.101(1)(c) and Iowa Rule of Civil Procedure 1.904(4): because the district court formally **denied** Appellant’s first Rule 1.904(2) motion on June 5, Respondent contends the ruling necessarily did not modify the May 28 order, and that any modification would have required the court first to grant reconsideration and then deny the underlying petition anew.

2. That specific disposition-label theory is directly addressed by recent Iowa appellate authority that materially assists resolution of the jurisdictional question: *In re Marriage of Waller and Kill*, No. 25-0899 (Iowa Ct. App. June 10, 2026).

3. In *Waller*, the district court’s ruling on the first Rule 1.904(2) motion likewise expressly stated that reconsideration was “**denied.**” The Court of Appeals nevertheless held that the ruling modified the prior order. The court explained:

“But in determining whether there was a modification, we look at the content of the ruling.”

Waller, No. 25-0899, slip op. at 8 (citing *Turner v. CCRC of Cedar Rapids, LLC*, No. 20-0973, 2021 WL 3076742, at *2–3 (Iowa Ct. App. July 21, 2021)).

4. The authority is particularly relevant because Respondent’s August 7 statement crystallizes the very formal-grant theory that *Waller* rejected. Appellant’s July 31 jurisdictional statement did not address Respondent’s subsequently articulated theory in those terms.

5. The record here presents an especially direct application of *Waller*. The May 28 order expressly stated that the petition failed “at the threshold” and that “**The Court does not reach the remaining considerations.**” The June 5 order then reached those previously unresolved considerations and determined, for the first time, that Appellant’s burdens were nonexternal, ordinary, foreseeable, self-created, and voluntarily undertaken. (May 28, 2026 Order at 1; June 5, 2026 Order at 1–3.)

6. The decretal result remained “denied.” The adjudicative basis did not.

Need for Expedited Consideration

7. This appeal concerns access to the November 3, 2026 general-election ballot. No ordinary merits briefing notice has yet issued.

8. The continuing passage of time therefore bears directly upon whether effective relief will remain available. Iowa Rule of Appellate Procedure 6.901(9) expressly provides that this Court may shorten the periods for serving and filing briefs.

9. Appellant respectfully requests exercise of that authority if jurisdiction is retained.

10. Appellant is contemporaneously filing a Declaration supplying current facts bearing on Respondent's mootness and futility arguments, including the number of petition signatures presently collected, Appellant's prior individual collection experience, her continuing intention to satisfy all statutory requirements, and her concrete plan to resume intensive circulation and recruit additional volunteer assistance.

Requested Order

WHEREFORE, Appellant respectfully requests that the Court:

1. grant leave to file the attached Proposed Supplemental Response and accompanying Declaration;
2. decline Respondent's request to dismiss the appeal;
3. determine that the July 20 notice of appeal was timely; and
4. if jurisdiction is retained, establish an expedited merits schedule pursuant to Iowa Rule of Appellate Procedure 6.901(9) sufficient to preserve the possibility of effective election relief.

Respectfully submitted,

/s/ Alexandra "Sondra" Wilson

Alexandra "Sondra" Wilson

Petitioner-Appellant, self-represented

P.O. Box 1953

Ames, Iowa 50010

Telephone: (515) 357-9725

Email: SondraWilson4Governor@gmail.com

CERTIFICATE OF SERVICE

I certify that on the date of electronic filing shown in the Iowa Judicial Branch Electronic Document Management System, I electronically filed the foregoing Motion for Leave to File Supplemental Response, together with the attached Proposed Supplemental Response and Declaration of Alexandra “Sondra” Wilson Regarding Current Ballot-Access Feasibility, which effectuated electronic service upon counsel of record for Respondent-Appellee.

/s/ Alexandra “Sondra” Wilson

Alexandra “Sondra” Wilson