

State of Indiana
Clay County Circuit Court

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| <p>Jeffrey P. Gallant,</p> <p style="text-align: right;"><i>Petitioner,</i></p> <p style="text-align: center;">v.</p> <p>Indiana Election Commission</p> <p style="text-align: right;"><i>Respondent.</i></p> | <p>Civil Cause No. 11C01-2603-RA-000185</p> |
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**Motion to Expedite Hearing and Resolution of Petition for Judicial Review
of Final Agency Action**

Comes now Petitioner, Jeffrey P. Gallant, by counsel, and for his Motion to Expedite Hearing and Resolution of Petition for Judicial Review of Final Agency Action (“**Motion to Expedite**”), states as follows:

1. On February 25, 2026, the Indiana Election Commission denied Petitioner’s Challenge (“**CAN-1**”) to the Declaration of Candidacy (“**CAN-2**”) of Alexandra Wilson (“**Mrs. Wilson**”) for the 2026 Republican primary for Senate District 38 (“**Challenge**”). The Petition before the Court seeks reversal of the Indiana Election Commission (“**Commission**”) decision denying the Challenge and remand to the Commission to immediately uphold the Challenge, disqualify Mrs. Wilson from being a candidate and prohibit her name appearing on the ballot for the 2026 Republican primary for Indiana Senate District 38 and so order the respective election boards of Vigo, Clay, and Sullivan Counties.

2. There are no material facts at issue; Mrs. Wilson has conceded at the Commission hearing that, in 2010, as Alexandra Rachele Anderson, she was arrested for and pleaded guilty to resisting arrest, a Class D felony, in Vermillion County Circuit Court (“**2010 plea**”).

3. Accordingly, the resolution of this Petition requires the Court to decide whether IC

3-8-1-5 (“**Disqualification Statute**”) applies to the 2010 plea. *See* IC 4-21.5-5-11(b) (in reviewing a final agency order, “[t]he court shall decide all questions of law, including any interpretation of a . . . state statute . . . without deference to any previous interpretation made by the agency.”).

Expedition is needed if meaningful relief is to be granted.

4. March 21, 2026 is the deadline for county election boards to mail primary election absentee ballots to voters who have filed an approved application. Indiana Election Commission, *2026 Indiana Election Calendar*.¹

5. To meaningfully effect the relief sought—distribution of ballots for the 2026 Republican primary for Senate District 38 that do not include the name of the challenged candidate—Petitioner seeks a hearing on his Petition on March 13, and a decision by this Court by close of business on March 17.

6. This will allow the Commission to notice and call a meeting for March 20th at which it upholds the Challenge, disqualifies Mrs. Wilson from being a candidate, prohibits her name from appearing on the ballot for the 2026 Republican primary for Indiana Senate District 38, and so orders the respective election boards of Vigo, Clay, and Sullivan Counties. To allow the Commission this time to effect the relief sought by Petitioner, he proposes the following schedule.

7. Concurrent with the filing of this Motion, Petitioner will seek a Joint Motion for

¹Available at <https://www.in.gov/counties/clarkcountyclerkofcourts/voting-and-elections/files/2026-Indiana-Election-Calendar.pdf>. *See also* IC § 3-11-4-15 (absentee ballots “shall be delivered to the circuit court clerk . . . at least (50) days before a general, primary, special or municipal election.”).

Stipulation Accepting an Agency Record, to include the CAN 1, CAN 2, the material before the Commission at the hearing and the relevant excerpts of the transcript of the hearing.

8. Petitioner will file his memorandum in support of his petition on Wednesday, March 4, 2026, with proposed order.

9. Respondent will file their memorandum in response on Monday, March 9, 2026.

10. Petitioner will file his reply on Wednesday, March 11, 2026.

11. The Court will hold a hearing, preferably remotely, on Friday, March 13, and the Court will rule on the Petition by the close of business on March 17, 2026.

12. In sum, to effect meaningful relief, the hearing of the Petition must be expedited such that the Court's Order on Review is entered by close of business on March 17, 2026.

Accordingly, Petitioner proposes that

Petitioner will file a memorandum in support of his petition on March 4, 2026.

Respondent will file their memorandum in response on March 9, 2026.

Petitioner will his reply on March 11, 2026.

The Court will hold a hearing, preferably remotely, on Friday, March 13.

WHEREFORE, Petitioner Jeffrey P. Gallant prays the Court expedite the hearing of his Petition such that the Court may enter an order no later than close of business March 17, 2026, and do so by adopting the schedule proposed *supra*.

Dated: March 3, 2026

Respectfully submitted,

/s/ James Bopp, Jr.
James Bopp, Jr., Ind. Bar No. 2838-84
THE BOPP LAW FIRM, PC
The National Building
1 South Sixth Street
Terre Haute, IN 47807
jboppjr@aol.com
Phone: 812/232-2434
Fax: 812/235-3685
Attorneys for Petitioner

Certificate of Service

I certify that on March 3, I electronically filed the foregoing documents and all attachments thereto using the Indiana E-filing System. I further certify that on March 3, the foregoing was served upon the following persons via IEFS:

The Indiana Election Commission
J. Bradley King, bking@iec.in.gov
Valerie Warycha, VaWarycha@iec.in.gov
Matthew Kochevar, mkochevar@iec.in.gov

The Indiana Attorney General's Office
Attorney General Todd Rokita, trokita219@atg.in.gov

Samantha DeWester, counsel for Mrs. Wilson
samantha@dewesterlaw.com