

**IN THE SUPREME COURT OF THE STATE OF IDAHO**

IDAHOANS UNITED FOR WOMEN  
AND FAMILIES,

Petitioner,

vs.

RAÚL R. LABRADOR, in his official  
capacity as the Idaho Attorney General;  
PHIL MCGRANE, in his official capacity  
as the Idaho Secretary of State; LORI  
WOLFF, in her official capacity as the  
Administrator of the Idaho Division of  
Financial Management; and the IDAHO  
DIVISION OF FINANCIAL  
MANAGEMENT,

Respondents.

**Docket No. 52636-2025**

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**DECLARATION OF ALAN M. HURST**

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RAÚL R. LABRADOR  
ATTORNEY GENERAL

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Sean M. Corkery, ISB #12350  
Assistant Solicitor General

*Attorneys for Respondents*

I, Alan M. Hurst, declare under penalty of perjury pursuant to the law of the State of Idaho that the following is true and correct.

I am the lead attorney for the Respondents in the above captioned matter and have personal knowledge of the facts set forth below pursuant to I.A.R. 34(d):

(1) The Respondents' Verified Answers and response briefs are currently due Tuesday, February 25, 2025, and the Petitioner's reply brief is currently due Tuesday, March 11, 2025.

(2) No previous extensions have been requested. The case is currently on an expedited briefing schedule.

(3) Good cause for this extension exists. On February 15, 2025, I contracted a moderately severe illness that currently prevents me from working. Medical tests suggest nothing is seriously wrong, but I do not believe it will be possible for me to review and revise my clients' filings in time to meet our present deadline.

(4) The motion for extension requests that the Verified Answers and response briefs deadline be extended by seven days to Tuesday, March 4, 2025, and that the reply brief deadline be correspondingly extended by seven days to Tuesday, March 18, 2025.

(5) All parties to the action have consented to the extension. On February 18, 2025, I received written notice from Ms. Jensen that she has no objections to the proposed extension.

(6) The Respondents' counsel have no deadlines that would prevent the briefs from being filed within the time requested.

DATED: February 18, 2025

STATE OF IDAHO  
OFFICE OF THE ATTORNEY GENERAL

By: /s/ Alan M. Hurst  
Alan M. Hurst  
Solicitor General

## CERTIFICATE OF SERVICE

I certify that on February 18, 2025, I filed the foregoing electronically through the iCourt E-File system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notification of Service:

Jennifer M. Jensen  
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*Attorneys for Petitioner*

/s/ Alan M. Hurst