

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA  
FOURTH JUDICIAL DISTRICT AT FAIRBANKS

TOK COMMUNITY UMBRELLA )  
CORPORATION, )

Plaintiff, )

vs. )

TOK CHAMBER OF COMMERCE, )  
INC., )

Defendant. )

LISA CONRAD, )

Third-Party Plaintiff, )

vs. )

TOK COMMUNITY UMBRELLA )  
CORPORATION (TCUC), TANYA )  
TITO, THERESA WOODY, and )  
RHONDA VanZANDT, )

Third-Party Defendants. )

Case No. 4FA-15-1930 CI

**TCUC SUBMISSION REGARDING JULY 9 ELECTION AND MOTION  
TO RETAIN STATUS QUO PENDING OUTCOME OF THIS LITIGATION**

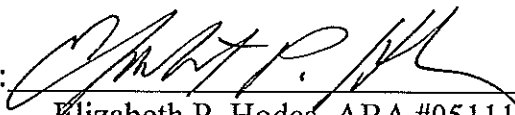
Pursuant to the Court's June 23, 2015 directive and Alaska R. Civ. P. 7(b),  
Plaintiff/Third Party Defendant Tok Community Umbrella Corporation ("TCUC") hereby  
submits that the July 9, 2015 election proceedings were not valid and the purported new  
board of TCUC may not act on behalf of the corporation until the allegations asserted in  
the First Amended Complaint have been fully litigated. At this time, TCUC's Board

1 consists of Lisa Conrad, Theresa Woody, Rhonda VanZandt, and Tanya Tito. The  
2 validity of the July 9 election has now been asserted in a First Amended Complaint and  
3 must be litigated in accordance with the civil rules.

4 Lisa Conrad is directly adverse to TCUC in this litigation, and counsel for TCUC  
5 (the engagement of which was undertaken by TCUC's insurer) obviously cannot take  
6 instruction nor consult with Ms. Conrad with respect to this litigation. Thus, TCUC  
7 further requests that the court affirm and further clarify its prior ruling regarding the  
8 limitations on Ms. Conrad's stewardship for the corporation. Finally, TCUC requests an  
9 order that the purported board allegedly established on July 9 is not authorized to act on  
10 behalf of the corporation unless and until a final judgment providing for such  
11 authorization is issued in this case. A memorandum in support of this motion is filed  
12 herewith.

13 DATED this 20<sup>th</sup> day of July, 2015.

14 DAVIS WRIGHT TREMAINE LLP  
15 Attorneys for Tok Community Umbrella  
16 Corporation

17 By:   
Elizabeth P. Hodes, ABA #0511108

1 Certificate of Service

2 On the 20<sup>th</sup> day of July, 2015, a true and  
3 correct copy of the foregoing document was sent  
4 by

5 ☒ U.S. Mail, postage paid  
6 ☐ Facsimile  
7 ☐ Email

8 to the following parties:

9 Zane D. Wilson  
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13 Fairbanks, AK 99707-0810

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18 By: 

19 Debra Anderson  
20  
21