

STATE OF SOUTH DAKOTA )  
 ) SS.  
COUNTY OF MINNEHAHA )

IN CIRCUIT COURT  
SECOND JUDICIAL CIRCUIT

DEBORAH MCISAAC, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
CITY OF BALTIC & LINDA HUNNEL, in )  
her official capacity as Finance Officer for )  
the City of Baltic, )  
 )  
Defendants. )

CASE NO. 49CIV23-001333

**DEFENDANTS’  
RESPONSE BRIEF**

Defendants, City of Baltic and Linda Hunnel (“City of Baltic”), by and through their attorney of record, Aidan F. Goetzinger of Gunderson, Palmer, Nelson and Ashmore, LLP, submit this response brief regarding the sufficiency of the grounds stated in the Petition for Recall of Deborah McIsaac as Mayor of the City of Baltic pursuant to the Court’s Scheduling Order.

Defendants do not take a position regarding the sufficiency of the grounds as stated in SDTG’s Petition. Should the Court find the Petition to sufficiently state grounds for Plaintiff’s removal from office, Defendants will provide input and seek an order from this Court with regard to recall election deadlines.

Dated: June 8, 2023.

GUNDERSON, PALMER, NELSON  
& ASHMORE, LLP

*/s/ Aidan F. Goetzinger*

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**CERTIFICATE OF SERVICE**

I hereby certify on June 8, 2023, a true and correct copy of the foregoing was served via Odyssey File and Serve upon the following:

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By:     /s/ Aidan F. Goetzing      
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