

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT ANCHORAGE

CAMPBELL STEM PRESERVATION)
& EDUCATION FOUNDATION,)
ALASKA CORPORATION,)

Plaintiff,)

v.)

ANCHORAGE SCHOOL DISTRICT)
and ANCHORAGE SCHOOL BOARD,)

Defendants.)

Case No. 3AN-26-06081 CI

**MOTION FOR STAY OF THAT PORTION OF THE COURT’S
PRELIMINARY INJUNCTION ORDER REQUIRING PUBLIC HEARING**

COMES NOW Defendants Anchorage School District and Anchorage School Board (collectively “ASD”), by and through its counsel of record, Schwabe, Williamson & Wyatt, P.C., and hereby move for a stay of that portion of the Court’s Preliminary Injunction Order requiring public hearing by May 15, 2026, to address the decision to close Campbell STEM Elementary School in light of a private grant the Court found may have been available to cover certain maintenance and repair costs.¹ A stay of this portion of the Court’s Preliminary Injunction Order is appropriate for two reasons. *First*, after the School Board became aware of these purported grant funds, the School Board voted twice at two separate School Board meetings to continue with the closure of Campbell STEM. *Second*, no such grant monies actually exist. The

¹ See Order Granting Preliminary Injunction and Limited Expedited Discovery at 27 (May 1, 2026) (“Preliminary Injunction Order”); see also *id.* at 23–24.

1 Court should accordingly stay that portion of its Preliminary Injunction Order that
 2 requires the School Board to hold a third public hearing on grant monies which were
 3 never actually awarded to Campbell STEM, pending resolution of the Motion for
 4 Reconsideration filed concurrently herewith.
 5

6 **A. The School Board Has Already Twice Considered Whether to Continue**
 7 **with the Closure of Campbell STEM in Light of Purported Grant Monies**

8 Requiring the School Board to hold a public hearing no later than May 15, 2026,
 9 to address its decision regarding Campbell STEM in light of the Court’s Order would
 10 be redundant and serve no purpose.² The School Board has *twice* voted to continue
 11 with the closure of Campbell STEM after learning of the purported private grant
 12 monies, which served as the basis of the Court’s finding that the School Board had
 13 failed to consider “pertinent funding sources” and thus failed to consider an important
 14 factor in the closure decision.³
 15
 16

17 As the Court explicitly found in its Preliminary Injunction Order, at the public
 18 March 17 School Board meeting, two members of the School Board—Dave Donley
 19 and Pat Higgins—stated that they were not aware of purported private grant funds
 20 earmarked for Campbell STEM maintenance and repair when they cast their initial
 21 votes against closing Campbell STEM.⁴ The School Board then voted on whether to
 22
 23

24 ² See *id.* at 27.

25 ³ See *id.* at 24.

26 ⁴ *Id.* at 23; see also Exhibit 4 at 3 to Opposition to Emergency Motion for Temporary Restraining Order, Preliminary Injunction and Limited Expedited Discovery (April 21, 2026) (showing Dave Donley and Pat Higgins both voted against the closure of Campbell STEM)

1 “rescind the action on the closure of Campbell STEM” in light of that new information.⁵

2 That vote failed, 3–3.⁶

3
4 At the public April 6 School Board meeting, the School Board again voted to
5 continue with the closure of Campbell STEM. Specifically, a motion was brought to
6 place on the next agenda the rescinding of the closure of Campbell STEM Elementary.⁷

7 That vote failed, 3–4.⁸

8
9 The Board has twice considered at public hearings whether to continue with the
10 closure of Campbell STEM in light of the purported private grant monies. Doing so a
11 third time would be redundant and accomplish nothing. It would simply reinforce that
12 the closure of Campbell STEM was the most desirable of a slew of undesirable options
13 to help balance the \$90 million deficit. It would not force reconsideration of the
14 decision based on new information. The School Board has already (twice) considered
15 that information and chosen to stay the course.
16

17 **B. There Are No Private Grant Monies Available for Campbell STEM**

18 That portion of the Court’s Preliminary Injunction Order requiring a public
19 hearing be held by May 15 to address the purported private grant funds should also be
20 stayed because *there are no such grant funds*.
21

22
23 Elementary).

24 ⁵ Order on Preliminary Injunction at 24.

25 ⁶ *Id.*

26 ⁷ See School Board Meeting Minutes for April 6, 2026 at 4, attached as **Exhibit 1**.

⁸ *Id.*

At the preliminary injunction hearing, ASD “asked the Court to consider listening to the audio record” of the relevant School Board meetings.⁹ The Court noted in its Preliminary Injunction Order that “time did not permit it to do so.”¹⁰

The recording of the April 6 public School Board meeting is available at the following web address:

- <https://www.youtube.com/watch?v=V3PYmb1o0Ak&list=PL-8GvZQOwWUGVIpSr-n57BfdXs9g3JbLW&index=8>

During that School Board meeting, Deputy Chief of Schools Kersten Johnson-Struempfer, Ed.D. provided an update to the Board regarding the purported private grant monies. Her testimony on the subject begins at approximately 1:14:40.¹¹ As she explained to the School Board and the public, there were two *potential* private grants. The first was for approximately \$500,000 that was applied for but not awarded. The second was a \$1,000,000 grant that was “sought after” but that a grant application had never even been submitted. In other words, there are no private grant monies available for the maintenance and repair of Campbell STEM.

C. CONCLUSION

For the foregoing reasons, the Court should stay that portion of its Preliminary Injunction Order requiring the School Board to address its decision regarding Campbell

⁹ Preliminary Injunction Order at 2 n.3.

¹⁰ *Id.*

¹¹ *See also* Transcript of Dr. Johnson’s Testimony, attached as **Exhibit 2**.

1 STEM in light of purported private funds available for maintenance and repair. After
2 learning of these purported grants, the School Board twice voted to continue with the
3 closure of Campbell STEM at public School Board meetings. Furthermore, no such
4 private grant monies have actually been awarded for the maintenance and repair of
5 Campbell STEM.
6

7 DATED at Anchorage, Alaska, this 4th day of May, 2026.
8

9 SCHWABE, WILLIAMSON & WYATT, P.C.
10 Attorneys for Defendant

11 By:



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School Board Meeting - Revised (Monday, April 6, 2026)

Generated by America Sullivan on Tuesday, April 7, 2026

The official record and details of this meeting can be found on the [ASD YouTube Channel HERE](#).

A. Regular Session

Procedural: 1. Call to Order / Roll Call / Flag Salute

Meeting called to order at 9:42 PM

Members present

Margo Bellamy, Dave Donley, Pat Higgins, Carl Jacobs, Kelly Lessens, Dora Wilson, Andy Holleman

Madison Arreola, Student Representative, spoke.

Procedural: 2. Land Acknowledgment / Opening Statement

Madison Arreola, Student Representative, spoke.

Action: 3. Approval of Agenda

To approve the agenda.

Motion by Margo Bellamy, second by Andy Holleman.

Final Resolution: Motion Passes

Yea: Margo Bellamy, Dave Donley, Pat Higgins, Carl Jacobs, Kelly Lessens, Dora Wilson, Andy Holleman

B. Reports

Report: 1. Student Representative Report

Madison Arreola, Student Representative, spoke.

Report: 2. Board Conference and Committee Reports

C. Goals & Guardrails Monitoring

Information: 1. Reading Proficiency - Student Achievement, Grades K-2 mCLASS DIBELS 8

Dr. Jharrett Bryantt, Superintendent, spoke.

Deanne Carroll, Director of Assessment & Evaluation, spoke.

Nicole Sommerville, Director of Elementary Teaching/Learning, spoke.

Brenda Cheathon, Sr. Director Elementary Education, spoke.

Jason Hlasny, Director Special Ed Instruction, spoke.

Jaime Galvan, Director of Indigenous Education, spoke.

Allison Susel, Director Student Support, spoke.

Information: 2. CCL - Cumulative Grade Point Average (GPA), Grades 9-12 - Technical Report

Dr. Jharrett Bryantt, Superintendent, spoke.

Information: 3. Guardrail #4 - Ensuring Available Mental Health Services

To move to the next meeting.

Motion to postpone Guardrail #4 until our next regular meeting on April 6, 2026.

Motion by Margo Bellamy, second by Andy Holleman.

Final Resolution: Motion Passes

Yea: Margo Bellamy, Dave Donley, Pat Higgins, Carl Jacobs, Kelly Lessens, Dora Wilson, Andy Holleman

D. Superintendent Update

Report: 1. Superintendent Update

Dr. Jharrett Bryantt, Superintendent, spoke.

Sven Gustafson, Deputy Superintendent, spoke.

Kersten Johnson-Struempfer, Deputy Chief of Schools, spoke.

Kelsey Deiman-Szymanski, Klatt Elementary Principal, spoke.

E. Public Comment (1-Hour Time Limit)

Received in the Alaska Trial Courts on 05/04/2026.

Information: 1. Student Comment

Gilligan Little spoke on Campbell STEM Elementary.
 Eleanor Gallegos spoke on Campbell STEM Elementary.
 Addison Gallegos spoke on Campbell STEM Elementary.
 Victor Hoedel spoke on Hanshew Middle School.
 River Corey spoke on Campbell STEM Elementary.
 Kyler Barnett spoke on Hanshew Middle School.
 Kylie Porter spoke on Hanshew Middle School.

Information: 2. Public Comment

Leesa Little spoke on Campbell STEM Elementary.
 Chanti Ward spoke on Campbell STEM Elementary.
 Cadence Gallegos spoke on Campbell STEM Elementary.
 Carmen Wegner spoke on Campbell STEM Elementary.
 Haim Wegner spoke on Campbell STEM Elementary.
 Rhondel Venner spoke on Campbell STEM Elementary.
 Gloria Burnett spoke on Hanshew Middle School.
 Crystal Gibson spoke on Hanshew Middle School.
 Daniel Gibson spoke on Hanshew Middle School.
 Paula Wright spoke on Hanshew Middle School.
 Jessica Aldridge spoke on Campbell STEM Elementary.
 Catrina Wolkoff spoke on Campbell STEM Elementary.
 Jacqueline Ballou spoke on Campbell STEM Elementary.
 Andrew Blankenburg spoke on Campbell STEM Elementary.
 Kristine Kalb spoke on Campbell STEM Elementary.
 Bradley Kalb spoke on Campbell STEM Elementary.
 Mollie Roache spoke on Campbell STEM Elementary.
 Gabriela Zych spoke telephonically on the riflery program.
 Kristy Harrington spoke on Campbell STEM Elementary.
 Amos Tomesen spoke on proposed arts model.
 Jamie Stout spoke on Hanshew Middle School.

10 Minute at ease at 8:41 PM

Back to order at 8:51 PM

Information: 3. Written Public Comment**F. Consent Agenda****Action (Consent): 1. Voting on Consent Agenda**

Resolution: To Approve the Consent Agenda, As Presented.

To Approve the Consent Agenda, As Modified.

Motion by Margo Bellamy, second by Kelly Lessens.

Final Resolution: Motion Passes

Yea: Margo Bellamy, Dave Donley, Pat Higgins, Carl Jacobs, Kelly Lessens, Dora Wilson, Andy Holleman

Action (Consent): 2. Acceptance of Reading Proficiency - Student Achievement, Grades K-2 mCLASS DIBELS 8

Resolution: To accept the Reading Proficiency - Student Achievement, Grades K-2 mCLASS DIBELS 8 report.

To Approve the Consent Agenda, As Modified.

Motion by Margo Bellamy, second by Kelly Lessens.

Final Resolution: Motion Passes

Yea: Margo Bellamy, Dave Donley, Pat Higgins, Carl Jacobs, Kelly Lessens, Dora Wilson, Andy Holleman

Action (Consent), Minutes: 3. March 17, 2026 Regular Meeting Minutes

Resolution: To accept March 17, 2026 Regular Meeting Minutes.

To Approve the Consent Agenda, As Modified.

Motion by Margo Bellamy, second by Kelly Lessens.

Final Resolution: Motion Passes

Yea: Margo Bellamy, Dave Donley, Pat Higgins, Carl Jacobs, Kelly Lessens, Dora Wilson, Andy Holleman

Action (Consent): 4. ASD Memorandum #133 - Sale of Surplus Property March 2026

Resolution: To dispose of the listed surplus property by sealed bid sale, public auction or other means as practical, in accordance with Board Policy 3270 Sale and Disposal of Books, Equipment and Supplies (Personal Property) and Administrative Regulation 3270 Sale and Disposal of Books, Equipment and Supplies (Personal Property).

To Approve the Consent Agenda, As Modified.

Motion by Margo Bellamy, second by Kelly Lessens.

Final Resolution: Motion Passes

Yea: Margo Bellamy, Dave Donley, Pat Higgins, Carl Jacobs, Kelly Lessens, Dora Wilson, Andy Holleman

Action (Consent): 5. ASD Memorandum #145 - Personnel Report

Resolution: To approve the attached Personnel Report.

To Approve the Consent Agenda, As Modified.

Motion by Margo Bellamy, second by Kelly Lessens.

Final Resolution: Motion Passes

Yea: Margo Bellamy, Dave Donley, Pat Higgins, Carl Jacobs, Kelly Lessens, Dora Wilson, Andy Holleman

G. Action Items**Action: 1. ASD Memorandum #117 - Approval of Ursa Major Elementary School 35% Schematic Design and Supplemental Education Specifications**

Jim Anderson, Chief Operating Officer, spoke.

Larry Morrison, Supervisor Planning & Design- Capital Planning/Construction, spoke.

Thomas Fenoseff, Sr Director Capital Planning & Construction, spoke.

To approve the 35% schematic design and supplemental educational specifications for Ursa Major Elementary School replacement project and authorize the Superintendent to use them as a guide for future capital improvements affecting the school and its campus.

Motion by Margo Bellamy, second by Dora Wilson.

Final Resolution: Motion Passes

Yea: Margo Bellamy, Dave Donley, Pat Higgins, Carl Jacobs, Kelly Lessens, Dora Wilson, Andy Holleman

Action: 2. ASD Memorandum #134 - Approval of School Name Change for Nunaka Valley Elementary - Revised

To approve the school name change from Nunaka Valley Elementary to Nunaka Valley, Home of Anchorage STREaM Academy.

Motion by Margo Bellamy, second by Andy Holleman.

Amendment #1:

I move to delete the paragraph titled "Language incorporated on March 26, 2026" altogether.

And to replace paragraph three with "As part of the process, opportunities for community input were provided, including consultation with the Chugachmiut Tribal Education Department. Outreach methods were implemented to ensure continued community access and participation. These included distribution of a community survey through neighborhood-based social media platforms and communication channels, as well as posting physical surveys throughout the neighborhood. These efforts provided community members multiple opportunities to submit input. During the Tribal consultation process, it was confirmed that the historical name "Nunaka" derives from the Sugt'stun word for "my village" or "my place." The Sugpiaq people are the ancestral people of the Lower Cook Inlet and contributed importantly to the creation of this school's history and its name."

Motion by Margo Bellamy, second by Andy Holleman.

Motion Passes

Yea: Margo Bellamy, Dave Donley, Pat Higgins, Carl Jacobs, Kelly Lessens, Dora Wilson, Andy Holleman

Main motion as amended: To approve the school name change from Nunaka Valley Elementary to Nunaka Valley, Home of Anchorage STREaM Academy.

Motion by Margo Bellamy, second by Andy Holleman.

Final Resolution: Motion Passes

Yea: Margo Bellamy, Dave Donley, Pat Higgins, Carl Jacobs, Kelly Lessens, Dora Wilson, Andy Holleman

Action: 3. ASD Memorandum #142 - Approval of Transfer for Rightsizing Moving Costs

Jim Anderson, Chief Operating Officer, spoke.

Dr. Jharrett Bryantt, Superintendent, spoke.

To approve a \$253,420 transfer to support the moving costs from rightsizing.

Motion by Margo Bellamy, second by Andy Holleman.

Final Resolution: Motion Passes

Yea: Margo Bellamy, Carl Jacobs, Kelly Lessens, Dora Wilson, Andy Holleman

Nay: Dave Donley, Pat Higgins

Action: 4. Resolution HB 78

I move to direct the Board President and Superintendent to draft a letter of support for House Bill 78 on behalf of the Board, a piece of legislation current being debated in Juneau which would restore a defined benefit retirement - or pension - to public sector employees, including Alaska's educators.

Motion by Margo Bellamy, second by Andy Holleman.

Final Resolution: Motion Passes

Yea: Margo Bellamy, Pat Higgins, Carl Jacobs, Kelly Lessens, Dora Wilson, Andy Holleman

Nay: Dave Donley

Action: 5. ASD Memorandum #140 - Approval of Revised ASD School Calendars for Years 2026-27, 2027-28, and 2028-29

Dr. Jharrett Bryantt, Superintendent, spoke.

Sven Gustafson, Deputy Superintendent, spoke.

Martin Lang, Chief Human Recourse Officer, spoke.

To approve and adopt the revised school calendars for the 2026-27, 2027-28, and 2028-29 school years, which add three additional instructional days pursuant to the recently approved AEA contract.

Motion by Margo Bellamy, second by Andy Holleman.

I move to postpone action on ASD Memorandum #140 for the next meeting on April 21, 2026.

Withdrawn

Motion by Pat Higgins, second by Dave Donley.

To approve and adopt the revised school calendars for the 2026-27, 2027-28, and 2028-29 school years, which add three additional instructional days pursuant to the recently approved AEA contract.

Motion by Margo Bellamy, second by Andy Holleman.

Final Resolution: Motion Passes

Yea: Margo Bellamy, Dave Donley, Pat Higgins, Carl Jacobs, Kelly Lessens, Dora Wilson, Andy Holleman

Action: 6. ASD Memorandum #141 - TCI Social Studies Curriculum Materials Purchase - Revised

Kersten Johnson-Struempfer, Deputy Chief of Schools, spoke.

To approve and authorize the purchase of TCI social studies textbooks and six-year digital licenses for a total amount of \$368,520.00.

Motion by Margo Bellamy, second by Andy Holleman.

Final Resolution: Motion Passes

Yea: Margo Bellamy, Dave Donley, Pat Higgins, Carl Jacobs, Kelly Lessens, Dora Wilson, Andy Holleman

H. Non-Action Items

Discussion: 1. ASD Memorandum #079 - Award of Contract: Alpenglow Elementary School Roof Replacement and Seismic Upgrades

I move to place on our next agenda the rescinding of the closure of Campbell Stem Elementary.

Moved by Andy Holleman, second by Dave Donley

Dr. Jharrett Bryantt, Superintendent, spoke.

Andy Ratliff, Chief Financial Officer, spoke.

Martin Lang, Chief Human Resources Officer, spoke.

Yea: Andy Holleman, Dave Donley, Pat Higgins

Nay: Kelly Lessens, Margo Bellamy, Dora Wilson, Carl Jacobs

Motion Fails

Received in the Alaska Trial Courts on 05/04/2026.

Information: 2. ASD Memorandum #122 - Approval of 35% Schematic Design and Supplemental Educational Specifications for Bartlett High School

Discussion: 3. ASD Memorandum #147- Approval of Budget Transfer for Third Grade Summer Learning

Discussion: 4. ASD Memorandum #148 - Policy Revisions to BP 5040 Student Nutrition and Physical Activity (First Reading)

Information: 5. ASD Memorandum #149 - Revisions to BP 5041 Health Education (First Reading)

Information: 6. ASD Memorandum #153 - FY 2026-2027 Special Tax Levy Budget Revisions - Revised

I. Continued Public Comment on Non-Agenda and Non-Action Items

J. School Board & Administration Comments/Communications

Information: 1. School Board and Administration Comments

Report: 2. Community Outreach - Written Reports

K. Adjournment

Procedural: 1. Adjournment

Motion to adjourn by Member Holleman, second by Member Bellamy.

Adjourned at 10:28 PM.

Received in the Alaska Trial Courts on 05/04/2026.

Meeting: Anchorage School Board Regular Meeting

Date: April 6, 2026

Source: <https://www.youtube.com/watch?v=V3PYmb1o0Ak&list=PL-8GvZQOwWUGVIpSr-n57BfdXs9g3JbLW&index=8>

- **Timestamp:** [01:14:40]
Speaker: Kersten Johnson-Struempler, Ed.D., Anchorage School District Deputy Chief of Schools
Quote: “The other thing I wanted to just address, um, it’s been, um, talked quite a bit about in our community and in public testimony around, um, grant monies that were awarded to Campbell STEM and, um, a concept of loosing those funds as a District. And we’ve done some research around those grants. And I just wanted to update the Board there were two grants. One was for about half a million dollars, that was applied for but not awarded. There was another million dollar grant that was sought after but as the school closure process happened, that grant was never submitted. So I just wanted to go on record to let the Board know that that million and a half dollars has not been awarded to Campbell STEM.”

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA

THIRD JUDICIAL DISTRICT AT ANCHORAGE

CAMPBELL STEM PRESERVATION)
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Plaintiff,)

v.)

ANCHORAGE SCHOOL DISTRICT)
and ANCHORAGE SCHOOL BOARD,)

Defendants.)

Case No. 3AN-26-06081 CI

[PROPOSED]

**ORDER GRANTING STAY OF THAT PORTION OF THE COURT'S
PRELIMINARY INJUNCTION ORDER REQUIRING PUBLIC HEARING**

THE COURT, upon consideration of Defendants Anchorage School District and Anchorage School Board's (collectively "ASD") Motion for Stay of that Portion of the Court's Preliminary Injunction Order Requiring Public Hearing ("Motion for Stay") and any opposition, hereby **GRANTS** the Motion for Stay.

IT IS HEREBY ORDERED that the portion of the Court's Order Granting Preliminary Injunction and Limited Expedited Discovery dated May 1, 2026, that orders "Defendants must address their decision regarding Campbell STEM Elementary in light of this order at a public hearing to be held by no later than May 15, 2026, with notice to be provided as required by law," is stayed in effect until such further order of the Court states otherwise.

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DATED at Anchorage, Alaska, this ____ day of _____, 2026.

Una Gandbhir
Superior Court Judge

AK Trial Courts Court Name	PROOF OF SERVICE	3AN-26-06081CI Case Number
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I certify that I served the following document on the persons listed below:

Motion or Motion Related (NOT Proposed Order): Motion for Stay

Proposed Order: Proposed Order Granting Motion for Stay

Person Served	Service Address	Type	Service Date
Scott LeFebvre	scott@impc-law.com	e-Serve	05-04-2026 5:01:57 PM
Ingaldson Fitzgerald, P.C.			54023d7c-222b-40d1-b29a-befedc036731
Matthew Singer	msinger@schwabe.com	e-Serve	05-04-2026 5:01:57 PM
Schwabe, Williamson & Wyatt, P.C.			68e58efe-4873-487d-8e69-15c90fe87115
Peter Scully	PScully@Schwabe.com	e-Serve	05-04-2026 5:01:57 PM
Schwabe, Williamson & Wyatt			40d1a26c-c50f-4c82-af89-9e3712e92c59
Kevin Fitzgerald	kevin@impc-law.com	e-Serve	05-04-2026 5:01:57 PM
Ingaldson Fitzgerald, P.C.			a311e60e-b98e-4cac-9c24-b6bf210a815a
Melissa Beneke	mbeneke@schwabe.com	e-Serve	05-04-2026 5:01:57 PM
Schwabe			095f614f-d1cb-4b0d-81d0-c564a5f710ca
William Wright	wwright@schwabe.com	e-Serve	05-04-2026 5:01:57 PM
Schwabe, Williamson & Wyatt			f254b79f-1c79-4250-ba77-74ac95f3e084

TrueFiling created, submitted and signed this proof of service on my behalf through my agreements with TrueFiling.

The contents of this proof of service are true to the best of my information, knowledge, and belief.

I declare under penalty of perjury that the foregoing is true and correct.

05-04-2026

Date

/s/Melissa Beneke

Signature

Wright, William (2209074)

Last Name, First Name (Attorney Number)

Schwabe, Williamson & Wyatt

Firm Name

