

**FILED**  
**05-30-2025**  
**CLERK OF WISCONSIN**  
**SUPREME COURT**

**IN THE SUPREME COURT OF WISCONSIN**

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KATE FELTON, et al.

*Petitioners,*

Case No. 2025AP000999-OA

v.

WISCONSIN ELECTIONS  
COMMISSION, et al.

*Respondents.*

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**MOTION FOR LEAVE TO FILE A NON-PARTY BRIEF ON BEHALF OF  
*AMICUS CURIAE* AMERICAN CIVIL LIBERTIES UNION OF WISCONSIN**

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The American Civil Liberties Union of Wisconsin, by undersigned counsel, respectfully moves this Court pursuant to Wis. Stat. § 809.19(7)(a) for leave to file a non-party brief in support of Petitioners, Kate Felton, *et al.*

The American Civil Liberties Union of Wisconsin (ACLU-WI) is a statewide, non-profit, non-partisan organization dedicated to the liberty and equality embodied in the federal and state constitutions and civil rights laws, including the fundamental right to vote. ACLU-WI has over 18,000 members in Wisconsin and requests leave to file the attached brief on its own behalf and on behalf of its members.

At this stage, this case requests the Court exercise its original jurisdiction to hear Petitioner's claims that Wisconsin's Congressional electoral maps are malapportioned in violation of the Wisconsin Constitution and that they should be declared illegal and redrawn.

The *Amicus Curiae* brief will demonstrate why this case meets the requirements for the Court to grant the petition and hear the case on the merits, the importance of the issues involved, and the underlying authority and long line of jurisprudence indicating that this Court can and should find that the Wisconsin Constitution provides more protection to voters than does federal law.

For the foregoing reasons, movant respectfully requests that this Court grant their motion for leave to file the attached non-party brief.

Dated: May 30, 2025

/s/ Ryan V. Cox

Ryan V. Cox

State Bar. No. 1140899

AMERICAN CIVIL LIBERTIES OF WISCONSIN  
FOUNDATION, INC.

207 East Buffalo Street, Suite 325

Milwaukee, WI 53202

Tel: (414) 272-4032 x244

Email: [rcox@aclu-wi.org](mailto:rcox@aclu-wi.org)

*Counsel for Amicus Curiae*