

FILED

05-30-2025

CLERK OF WISCONSIN

SUPREME COURT

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**No. 2025AP999-OA**

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***In the Supreme Court of Wisconsin***

KATE FELTON, LOREN DE LONAY, KYLE JOHNSON, RAYMOND  
SPELLMAN, VALERIA CERDA, LYNN CAREY, RAFAEL SALAS,  
CURTIS GAUTHIER, AND PATRICIA SCIESZINSKI  
PETITIONERS,

V.

WISCONSIN ELECTIONS COMMISSION, ANN S. JACOBS, MARK  
L. THOMSEN, CARRIE RIEPL, DON M. MILLIS, ROBERT F.  
SPINDELL, JR., MARGE BOSTELMANN, IN THEIR OFFICIAL  
CAPACITIES AS MEMBERS OF THE WISCONSIN ELECTIONS  
COMMISSION AND MEAGAN WOLFE, IN HER OFFICIAL  
CAPACITY AS THE ADMINISTRATOR OF THE WISCONSIN  
ELECTIONS COMMISSION,  
RESPONDENTS.

**MOTION OF BILLIE L. JOHNSON, ERIC O'KEEFE,  
RONALD ZAHN, CHRIS GOEBEL, AARON R.  
GUENTHER, CHARLES HANNA, TIM HIGGINS,  
SANDY JANZER, ADAM JARCHOW, GAE  
MAGNAFICI, TERRY MOULTON, MICHAEL  
MURPHY, JOSEPH SANFELIPPO, RUTH STRECK  
AND MARY JO THOMPSON FOR LEAVE TO FILE A  
NONPARTY BRIEF IN OPPOSITION TO PETITION  
FOR AN ORIGINAL ACTION**

WISCONSIN INSTITUTE FOR  
LAW & LIBERTY, INC.

RICHARD M. ESENBERG

LUCAS T. VEBBER

NATHALIE E. BURMEISTER

330 E. Kilbourn Ave., Ste. 725

Milwaukee, WI 53202

Phone: (414) 727-9455

Facsimile: (414) 727-6385

Pursuant to Wis. Stat. § 809.19(7) and this Court's order dated May 15, 2025, Movants Billie L. Johnson, Eric O'Keefe, Ronald Zahn, Chris Goebel, Aaron R. Guenther, Charles Hanna, Tim Higgins, Sandy Janzer, Adam Jarchow, Gae Magnafici, Terry Moulton, Michael Murphy, Joseph Sanfelippo, Ruth Streck and Mary Jo Thompson, by their undersigned counsel, hereby move for leave to file a nonparty brief in opposition to the Petition for an Original Action. A copy of the proposed nonparty brief is filed simultaneously with this motion. The grounds for this motion are as follows:

1. Movants are a group of voters throughout the state of Wisconsin, residing in every Congressional district:
  - a. Movants Chris Goebel and Sandy Janzer reside in District 1.
  - b. Movants Billie L. Johnson and Eric O'Keefe reside in District 2.
  - c. Movant Terry Moulton resides in District 3.
  - d. Movants Charles Hanna and Michael Murphy reside in District 4.
  - e. Movants Joe Sanfelippo and Mary Jo Thompson reside in District 5.

f. Movants Aaron R. Guenther and Ruth Streck reside in District 6

g. Movants Adam Jarchow and Gae Magnafici reside in District 7.

h. Movants Tim Higgins and Ronald Zahn reside in District 8.

2. Three of the Movants, Billie Johnson, Eric O’Keefe, and Ronald Zahn, were among the original petitioners in the *Johnson v. WEC* litigation in which this Court first adopted the Congressional district maps which the Petition for an Original Action seeks to challenge.

3. Movants seek leave to file a nonparty brief to explain why the existing maps are lawful, and any attempt to redraw the Congressional district lines at this time would violate the United States Constitution.

4. Further, as original petitioners from *Johnson*, several of Movants have an interest in ensuring the decision from that case continues to be in effect going forward.

5. Movants will provide perspective from across Wisconsin and seek to provide additional information and context which will help this Court decide whether to grant the Petition for an Original Action.

WHEREFORE, Movants respectfully request this Court grant this motion and accept the simultaneously filed nonparty brief for filing.

Dated: May 30, 2025.

Respectfully submitted,

WISCONSIN INSTITUTE FOR  
LAW & LIBERTY, INC.

*Electronically signed by*  
*Lucas T. Vebber*

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Richard M. Esenberg (#1005622)

Lucas T. Vebber (#1067543)

Nathalie E. Burmeister (#1126820)

330 East Kilbourn Avenue, Ste. 725

Milwaukee, WI 53202

Telephone: (414) 727-9455

Facsimile: (414) 727-6385

Rick@will-law.org

Lucas@will-law.org

Nathalie@will-law.org

*Attorneys for Movants*