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CLERK OF WISCONSIN
SUPREME COURT

No. 2025AP996-OA

In the Supreme Court of Wisconsin

ELIZABETH BOTHFELD, JO ELLEN BURKE, MARY COLLINS, CHARLENE GAEBLER-UHING, PAUL HAYES, SALLY HUCK, TOM KLOOSTERBOER, ELIZABETH LUDEMAN AND LINDA WEAVER,
PETITIONERS,
V.
WISCONSIN ELECTIONS COMMISSION, DON MILLIS, ROBERT F. SPINDELL, JR., MARGE BOSTELMANN, ANN S. JACOBS, MARK L. THOMSEN, CARRIE RIEPLE, IN THEIR OFFICIAL CAPACITIES AS COMMISSIONERS OF THE WISCONSIN ELECTIONS COMMISSION; AND MEAGAN WOLFE, IN HER OFFICIAL CAPACITY AS 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

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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 why 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 the 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: June 6, 2025.

Respectfully submitted,

WISCONSIN INSTITUTE FOR
LAW & LIBERTY, INC.

Electronically signed by
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