

FILED

11-08-2023

CLERK OF WISCONSIN
SUPREME COURT

In the Supreme Court of Wisconsin

Appeal No. 2023AP1399

REBECCA CLARKE, RUBEN ANTHONY, TERRY DAWSON, DANA
GLASSTEIN, ANN GROVES-LLOYD, CARL HUJET, JERRY IVERSON,
TIA JOHNSON, ANGIE KIRST, SELIKA LAWTON, FABIAN
MALDONADO, ANNEMARIE MCCLELLAN, JAMES MCNETT,
BRITTANY MURIELLO, ELA JOOSTEN (PARI) SCHILS, NATHANIEL
SLACK, MARY SMITH-JOHNSON, DENISE SWEET AND GABRIELLE
YOUNG,
Petitioners,

v.

WISCONSIN ELECTIONS COMMISSION; DON MILLIS, ROBERT F.
SPINDELL, JR., MARK L. THOMSEN, ANN S. JACOBS, MARGE
BOSTELMANN, AND JOSEPH J. CZARNEZKI, IN THEIR OFFICIAL
CAPACITIES AS MEMBERS OF THE WISCONSIN ELECTION
COMMISSION; MEAGAN WOLFE, IN HER OFFICIAL CAPACITY AS THE
ADMINISTRATOR OF THE WISCONSIN ELECTIONS COMMISSION;
ANDRE JACQUE, TIM CARPENTER, ROB HUTTON, CHRIS LARSON,
DEVIN LEMAHIEU, STEPHEN L. NASS, JOHN JAGLER, MARK
SPREITZER, HOWARD MARKLEIN, RACHAEL CABRAL-GUEVARA,
VAN H. WANGGAARD, JESSE L. JAMES, ROMAINE ROBERT QUINN,
DIANNE H. HESSELBEIN, CORY TOMCZYK, JEFF SMITH, AND
CHRIS KAPENGA, IN THEIR OFFICIAL CAPACITIES AS MEMBERS OF
THE WISCONSIN SENATE,
Respondents.

**MOTION OF WISCONSIN MANUFACTURERS &
COMMERCE, INC., SEEKING LEAVE TO FILE A NON-
PARTY BRIEF**

Wisconsin Manufacturers & Commerce, Inc. (WMC), by its undersigned attorney, moves this Court for permission to file the accompanying non-party brief pursuant to Wis. Stat. § 809.19(7). In support of its motion, WMC states as follows:

1. WMC is Wisconsin's chamber of commerce and manufacturers' association. With member businesses of all sizes and across all sectors of Wisconsin's economy, WMC is the largest business trade association in Wisconsin. Since its founding in 1911, WMC has been dedicated to making Wisconsin the most competitive state in the nation in which to conduct business. To accomplish that mission, WMC is dedicated to ensuring that free enterprise is enabled to flourish under the law.

2. WMC and its members have a strong interest in this case. WMC and its members have forged relationships with the representatives elected pursuant to the current maps. Members of WMC have relied on political vows made by those same representatives.

3. WMC seeks to file this non-party brief to provide legal context necessary to resolve this dispute. This contextual information will help the Court decide this case because the parties' dispute depends heavily on the precedential authority of cases this court has decided and doctrines it has adopted.

4. The non-party brief of WMC accompanies this motion.

WHEREFORE, Wisconsin Manufacturers & Commerce respectfully requests that this Court grant this motion for leave to file the accompanying non-party brief.

Dated this 8th day of November 2023.

Electronically signed by

Nathan J. Kane

Nathan J. Kane
Wis. Bar No. 1119329
WMC Litigation Center
501 East Washington Avenue
Madison, Wisconsin 53703
(608) 661-6918
nkane@wmc.org

Attorney for Wisconsin Manufacturers & Commerce, Inc.