

**No. 2024AP1643-OA**

**FILED**

**08-23-2024**

**CLERK OF WISCONSIN**

**SUPREME COURT**

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

DAVID STRANGE, INDIVIDUALLY AND AS DEPUTY  
OPERATIONS DIRECTOR - WISCONSIN FOR THE DEMOCRATIC  
NATIONAL COMMITTEE,  
PETITIONER,

V.

WISCONSIN ELECTIONS COMMISSION, MEAGAN WOLFE, IN  
HER CAPACITY AS ADMINISTRATOR OF  
WISCONSIN ELECTIONS COMMISSION, DON MILLIS, IN HIS  
CAPACITY AS COMMISSIONER OF WISCONSIN ELECTIONS  
COMMISSION, ROBERT SPINDELL, JR., IN HIS OFFICIAL  
CAPACITY AS COMMISSIONER OF WISCONSIN ELECTIONS  
COMMISSION, MARGE BOSTELMANN, IN HER CAPACITY AS  
COMMISSIONER OF WISCONSIN ELECTIONS COMMISSION,  
ANN JACOBS, IN HER CAPACITY AS COMMISSIONER  
OF WISCONSIN ELECTIONS COMMISSION, MARK THOMSEN, IN  
HIS CAPACITY AS COMMISSIONER OF WISCONSIN ELECTIONS  
COMMISSION AND CARRIE RIEPL, IN HER CAPACITY AS  
COMMISSIONER OF WISCONSIN ELECTIONS COMMISSION, AND  
WISCONSIN GREEN PARTY  
RESPONDENTS.

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**MOTION OF RITA MANIOTIS & TRAVIS KOBS FOR  
LEAVE TO FILE A NONPARTY BRIEF IN OPPOSITION  
TO THE PETITION FOR LEAVE TO FILE AN ORIGINAL  
ACTION**

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Rita Maniotis and Travis Kobs respectfully move this Court, pursuant to Wis. Stat. § (Rule) 809.19(7), for leave to file a nonparty brief in this matter. The grounds for this motion are as follows:

1. Maniotis resides in Wisconsin.
2. Maniotis is a Wisconsin elector and a member of the Green Party.
3. Maniotis plans to vote for Jill Stein and Butch Ware, the Green Party's nominees for President and Vice President.
4. Maniotis wants the Green Party to be listed on the ballot, just like the Democratic Party and the Republican Party.
5. Accordingly, Maniotis has an interest in this matter.
6. Travis Kobs resides in Wisconsin.
7. Kobs is a Wisconsin elector.
8. Kobs is a self-identified libertarian.
9. Kobs has voted for candidates from various political offices.
10. Like Maniotis, Kobs wants the Green Party (and third parties generally) to have the same ballot access as the Democratic Party and Republican Party.
11. Kobs worries that this action could affect third parties other than the Green Party.
12. The attached proposed brief will provide this Court with analysis of legal issues raised by the petition that this Court should know about.
13. In particular, Maniotis and Kobs explain that the petition raises a nonsensical interpretation of Wis. Stat. § 8.18 that would cause significant harm to ballot access and, more generally, to democracy in Wisconsin.

14. Mainotis and Kobs also explain that this interpretation likely violates the United States Constitution by functionally adding a qualification for the Office of President.

15. Lastly, Mainotis and Kobs overview several procedural issues that this Court would need to consider to even reach the merits.

WHEREFORE, Rita Maniotis and Travis Kobs respectfully move that this Court grant them leave to file the attached nonparty brief.

Dated: August 23, 2024.

Respectfully submitted,

WISCONSIN INSTITUTE FOR  
LAW & LIBERTY, INC.

*Electronically signed by Skylar Croy*

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