

SUPREME COURT OF WISCONSIN

Appeal No. 2021AP1450–OA

BILLIE JOHNSON, et al.,

Petitioners,

v.

WISCONSIN ELECTIONS COMMISSION, et al.,

Respondents.

Original Action in the Supreme Court of Wisconsin

NOTICE OF MOTION AND UNOPPOSED MOTION TO INTERVENE OF GARY KRENZ, SARAH J. HAMILTON, STEPHEN JOSEPH WRIGHT, JEAN-LUC THIFFEAULT, AND SOMESH JHA

NOTICE OF MOTION

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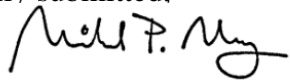
PLEASE TAKE NOTICE that Proposed Intervenor Gary Krenz, Sarah J. Hamilton, Stephen Joseph Wright, Jean-Luc Thiffeault, and Somesh Jha (collectively “Citizen Mathematicians and Scientists”) hereby move to intervene as Petitioners in this action. This motion is supported by the Memorandum and the proposed Complaint submitted herewith. This motion will be heard at a date and time set by the Court.

UNOPPOSED MOTION

In accordance with this Court's September 22, 2021 Order (as amended on September 24, 2021) and Wis. Stat. § (Rule) 803.09, Proposed Intervenor Gary Krenz, Sarah J. Hamilton, Stephen Joseph Wright, Jean-Luc Thiffeault, and Somesh Jha (collectively, "Proposed Intervenor" or "Citizen Mathematicians and Scientists") hereby move the Court to intervene as Petitioners in this action.¹ The bases for Proposed Intervenor's intervention are stated in an accompanying Memorandum. The Proposed Intervenor also attach a proposed Complaint.² None of the original parties in this action opposes intervention by the Citizen Mathematicians and Scientists.³

Dated: October 6, 2021

Respectfully submitted,



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¹ Drs. Wright, Thiffeault, and Jha are among the proposed plaintiff-intervenor in the redistricting cases currently pending in the U.S. District Court for the Western District of Wisconsin.

² Petitioners Billie Johnson, Eric O'Keefe, Ed Perkins, and Ronald Zahn have indicated through counsel that they reserve the right to oppose the proposed pleading if it substantively expands the scope of this case.

³ Petitioners Billie Johnson, Eric O'Keefe, Ed Perkins, and Ronald Zahn have indicated through counsel that they do not oppose intervention by the Citizen Mathematicians and Scientists. Respondents Wisconsin Elections Commission, Marge Bostelmann, Julie Glancey, Ann Jacobs, Dean Knudson, Robert Spindell, and Mark Thomsen have indicated through counsel that they take no position on the motion.