

**No. 2021AP1450-OA**

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**IN THE SUPREME COURT OF WISCONSIN**

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BILLIE JOHNSON, ERIC O'KEEFE,  
ED PERKINS, AND RONALD ZAHN,

*Petitioners,*

BLACK LEADERS ORGANIZING FOR COMMUNITIES,  
VOCES DE LA FRONTERA, LEAGUE OF WOMEN VOTERS OF WISCONSIN,  
CINDY FALLONA, LAUREN STEPHENSON, REBECCA ALWIN, CONGRESSMAN  
GLENN GROTHMAN, CONGRESSMAN MIKE GALLAGHER, CONGRESSMAN  
BRYAN STEIL, CONGRESSMAN TOM TIFFANY, CONGRESSMAN SCOTT  
FITZGERALD, LISA HUNTER, JACOB ZABEL, JENNIFER OH, JOHN PERSA,  
GERALDINE SCHERTZ, KATHLEEN QUALHEIM, GARY KRENZ, SARAH J.  
HAMILTON, STEPHEN JOSEPH WRIGHT, JEAN-LUC THIFFEAULT,  
AND SOMESH JHA,

*Intervenors-Petitioners,*

v.

WISCONSIN ELECTIONS COMMISSION, MARGE BOSTELMANN, in her official  
capacity as a member of the Wisconsin Elections Commission, JULIE  
GLANCEY, in her official capacity as a member of the Wisconsin Elections  
Commission, ANN JACOBS, in her official capacity as a member of the  
Wisconsin Elections Commission, DEAN KNUDSON, in his official capacity as  
a member of the Wisconsin Elections Commission, ROBERT SPINDELL, JR.,  
in his official capacity as a member of the Wisconsin Elections  
Commission, AND MARK THOMSEN, in his official capacity as a member of  
the Wisconsin Elections Commission,

*Respondents,*

THE WISCONSIN LEGISLATURE, GOVERNOR TONY EVERS, in his  
official capacity, AND JANET BEWLEY SENATE DEMOCRATIC MINORITY  
LEADER, on behalf of the Senate Democratic Caucus,

*Intervenors-Respondents.*

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**MOTION FOR LEAVE TO FILE REPLY LETTER BRIEF**

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*Counsel for Intervenor-Respondent,  
The Wisconsin Legislature*

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The Wisconsin Legislature, as movant and Respondent-Intervenor in these proceedings, respectfully requests that this Court grant it leave to file the enclosed reply letter brief in support of its motion for a stay pending appeal. Today, there were five response letter briefs filed in opposition to the Legislature's motion, as well as the Johnson Petitioners' brief in support of it. Some responses raise issues of standing for the first time. The Legislature's short reply addresses some of those responses including the standing arguments, is only 5 pages, and is filed within hours after receiving the responses so as not to delay the Court's decision on the motion. The Legislature's letter brief should aid the Court in its decision-making. For the foregoing reasons, the Legislature respectfully requests leave to file the enclosed letter brief.

Dated this 9th day of March, 2022.

Respectfully submitted,

Electronically Signed By  
Kevin M. St. John

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### **CERTIFICATION**

**Form.** I hereby certify that this motion conforms to the rules contained in Wis. Stat. § 809.81 governing the format of motions filed with this Court.

**Filing, Electronic Filing, and Service.** Per the Court's Order of March 7, 2022, I certify that on this day I caused this motion and the enclosed letter brief to be filed with the Court by emailing the clerk. In addition, per the service instructions in this Court's March 7, 2022, order, I will cause the original and 10 paper copies of all documents filed to be received by the clerk of this court by 12:00 noon tomorrow with the document bearing the following notation on the top of the first page: "This document was previously filed via email." I further certify that on this day, I caused service copies of these documents to be sent by email to all counsel of record, all of whom have consented to service by email.

Dated this 9th day of March 2022.

Respectfully submitted,

Electronically Signed by  
Kevin M. St. John

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