

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

PRIORITIES USA, RISE INC., and  
THE DETROIT/DOWNRIVER  
CHAPTER OF THE A. PHILIP  
RANDOLPH INSTITUTE,

Plaintiffs,

Case No. 19-cv-13341

v.

Honorable Stephanie Dawkins Davis  
Magistrate Judge Kimberly G. Altman

DANA NESSEL, in her  
official capacity as Attorney General  
of the State of Michigan,

Defendant

and

THE MICHIGAN SENATE, THE  
MICHIGAN HOUSE OF REPRESENTATIVES,  
THE MICHIGAN REPUBLICAN PARTY and THE  
REPUBLICAN NATIONAL COMMITTEE,

Intervening Defendants.

---

**THE MICHIGAN SENATE AND THE MICHIGAN HOUSE OF  
REPRESENTATIVES' CONCURRENCE IN THE RULE 56 MOTION  
FILED BY ATTORNEY GENERAL NESSEL**

The Michigan Senate and Michigan House of Representatives join in and concur in the relief sought by Michigan Attorney General Dana Nessel in her motion for summary judgment under Fed. R. Civ. Proc. 56, and therefore respectfully request that this Honorable Court enter an order dismissing the

Plaintiffs' Amended Complaint in its entirety and with prejudice.

Respectfully submitted,

BUSH SEYFERTH PLLC

*Attorneys for the Michigan Senate and the  
Michigan House of Representatives*

By: /s/ Roger P. Meyers

Patrick G. Seyferth (P47475)

Roger P. Meyers (P73255)

Susan M. McKeever (P73533)

Brittney D. Kohn (P80186)

Jonathan Jones (P82516)

100 W. Big Beaver Rd., Ste. 400

Troy, MI 48084

(248) 822-7800

seyferth@bsplaw.com

meyers@bsplaw.com

mckeever@bsplaw.com

kohn@bsplaw.com

jones@bsplaw.com

Dated: April 11, 2022