

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

---

ONE WISCONSIN INSTITUTE, INC., *et al.*,

Plaintiffs,

v.

Case No. 15-CV-324-JDP

ANN S. JACOBS, Chair, Wisconsin  
Elections Commission, *et al.*,

Defendants.

---

ALICE WEDDLE,

Plaintiff,

v.

Case No. 20-cv-768-JDP

TONY EVERS, *et al.*,

Defendants.

---

**JOINT STATUS REPORT AND REQUEST TO HOLD CERTAIN DEADLINES IN  
ABEYANCE PENDING JANUARY 11, 2022 STATUS CONFERENCE**

---

The Court will hold a status conference next Tuesday, January 11 at 3:00 PM by Zoom video conference. ECF No. 475. The parties believe they are making very good progress in drafting, exchanging, and negotiating their proposed stipulated facts under the process spelled out in the Court's August 18, 2021 Order, ECF No. 448 at 2-3. That Order "leave[s] it to the parties to determine how and when to confer with each other before submitting their stipulated facts" on January 18, 2022. *Id.* at 3 (the Order says January 17, but that is a federal holiday). The parties have been engaged in an intensive meet-and-confer process since mid-December on this topic.

In addition to other matters the Court wishes to address during the January 11 status conference, the parties would like to discuss this ongoing meet-and-confer process and seek the Court's guidance on the proposed findings and other upcoming pretrial filings. In the meantime, the current schedule calls for motions in limine and trial exhibits to be filed by Monday, January 10, with responses to motions in limine and objections to exhibits and witnesses due by January 18. ECF No. 448 at 2 (again, the Order says January 17 but that is a federal holiday).

The parties jointly request that the Court hold all pre-January 11 deadlines in abeyance pending the January 11 status conference, so that the parties and Court can discuss at the status conference the best sequencing of the upcoming pretrial filings. The parties believe the ongoing meet-and-confer process may narrow the number of necessary exhibits and motions in limine, and that an additional week would also enable the parties to work on eliminating unnecessarily duplicative or overlapping filings. In addition, many of the exhibits will need to be filed under seal because they contain highly confidential personal information about individual IDPP petitioners. The parties believe it would be prudent to review protective order concerns and confirm procedures for filing under seal with the Court at the January 11 status conference prior to filing any exhibits.

If the Court prefers to receive all pretrial exhibits and motions in limine on Monday, January 10 rather than waiting to discuss the sequencing of filings at the January 11 status conference, the parties will of course proceed as the Court instructs.

Dated this 6th day of January, 2022.

Respectfully submitted,

Bruce V. Spiva  
Perkins Coie LLP  
700 Thirteenth Street, N.W., Suite 600  
Washington, D.C. 20005-3960  
Telephone: (202) 654-6200  
Facsimile: (202) 654-6211  
Bspiva@perkinscoie.com

Bobbie J. Wilson  
Perkins Coie LLP  
505 Howard Street, Suite 1000 San Francisco,  
CA 94111-4131 Telephone: (415) 344-7000  
Facsimile: (415) 344-7050  
BWilson@perkinscoie.com

/s/ Karyn L. Rotker  
Karyn L. Rotker  
ACLU of Wisconsin Foundation, Inc.  
207 East Buffalo Street, Suite 325  
Milwaukee, WI 53202  
Phone: (414) 272-4032 x12  
Fax: (414) 272-0182  
krotker@aclu-wi.org

Neil A. Steiner  
Dechert LLP  
1095 Avenue of the Americas  
New York, NY 10036-6797  
Phone: (212)-698-3500  
Fax: (212)-698-3599  
neil.steiner@dechert.com

Selby Brown  
Dechert LLP  
Cira Centre  
2929 Arch Street  
Philadelphia, PA 19104

/s/ Charles G. Curtis, Jr.  
Charles G. Curtis, Jr.  
Will M. Conley  
Juan Fonseca Angel  
Perkins Coie LLP  
33 East Main Street, Suite 201  
Madison, WI 53703  
Telephone: (608) 663-5411  
Facsimile: (608) 663-7499  
CCurtis@perkinscoie.com  
wconley@perkinscoie.com  
jfonsecaangel@perkinscoie.com

*Attorneys for One Wisconsin Plaintiffs*

Davin M. Rosborough  
Samantha Osaki  
T. Alora Thomas  
American Civil Liberties Union Foundation  
125 Broad Street, 18th Floor  
New York, NY 10004  
Phone: (212) 549-2500  
Fax: (212)-549-2648  
dho@aclu.org  
athomas@aclu.org  
drosborough@aclu.org  
sosaki@aclu.org

Angela M. Liu  
Dechert LLP  
35 West Wacker Drive, Suite 3400  
Chicago, IL 60601  
Phone: (312) 646-5800  
Fax: (312) 646-5858  
angela.liu@dechert.com

Anna Q. Do  
Dechert LLP  
US Bank Tower  
633 West 5th Street, Suite 4900  
Los Angeles, CA 90071

Phone: (215) 994-4000  
Fax: (215) 994-2222  
selby.brown@dechert.com

Phone: (213) 808-5760  
Fax: (213) 808-5760  
anna.do@dechert.com

Tristia Bauman  
Carlton Martin  
National Law Center for Homelessness &  
Poverty  
2000 M Street NW, Suite 210  
Washington, D.C. 20036  
Phone: (202) 638-2535

*Attorneys for Alice Weddle and certified class*

ERIC J. WILSON  
Deputy Attorney General of Wisconsin

Electronically signed by:

*/s/ S. Michael Murphy*

S. MICHAEL MURPHY  
Assistant Attorney General  
State Bar #1078149

GABE JOHNSON-KARP  
Assistant Attorney General  
State Bar #1084731

JODY J. SCHMELZER  
Assistant Attorney General  
State Bar #1027796

Attorneys for Defendants

Wisconsin Department of Justice  
Post Office Box 7857  
Madison, Wisconsin 53707-7857  
(608) 266-5457 (Murphy)  
(608) 267-8904 (Johnson-Karp)  
(608) 266-3094 (Schmelzer)  
(608) 267-2223 (Fax)