

RISE, INC., *and* JASON RIVERA,

Plaintiffs,

v.

Case No. 2022CV2446

WISCONSIN ELECTIONS COMMISSION,
MARIBETH WITZEL-BEHL, *in her
official capacity as City Clerk for the
City of Madison, Wisconsin,* TARA
McMENAMIN, *in her official capacity
as City Clerk for the City of Racine,
Wisconsin,* and CELESTINE JEFFREYS,
*in her official capacity as City Clerk for
the City of Green Bay, Wisconsin,*

Defendants.

**INTERVENOR DEFENDANT THE WISCONSIN STATE
LEGISLATURE'S NOTICE OF MOTION AND
MOTION FOR STAY PENDING APPEAL**

TO: Rise, Inc.
820 Kodak Dr.
Los Angeles, CA 90026

Jason Rivera
108 N. Bedford St.
Madison, WI 53703

Wisconsin Elections Commission
201 West Washington Ave., Second Floor
Madison, WI 53707

Maribeth Witzel-Behl
210 Martin Luther King Jr. Blvd., Room 103
Madison, WI 53703

Tara McMenamin
730 Washington Ave., Rm. 103
Racine, WI 53403

Celestine Jeffreys
100 N. Jefferson St., Rm. 106
Green Bay, WI 54301

PLEASE TAKE NOTICE that Intervenor Defendant the Wisconsin State Legislature (“Legislature”), by and through its undersigned attorneys at Troutman Pepper Hamilton Sanders LLP, hereby moves the Court, under Wis. Stat. § 809.12 and Wis. Stat. § 808.07(2)(a), for an order staying execution of the Court’s January 2, 2024 Decision And Order, Dkt.233, and its January 30, 2024 Declaratory Judgment And Permanent Injunction Order, Dkt 238, during the pendency of the Legislature’s appeal from those decisions. The Legislature provides the grounds for this Motion in its contemporaneously filed Brief In Support Of Motion For Stay Pending Appeal.

PLEASE TAKE FURTHER NOTICE that this Court has ordered this Motion to be heard, Dkt.237, at 1:00 p.m. on Friday, February 2, 2024, at:

8th Floor, Courtroom 8C - Branch 10
215 S Hamilton Street
Madison WI 53703-3285

Dated: January 31, 2024

Respectfully submitted,

Electronically signed by Misha Tseytlin

MISHA TSEYTLIN

State Bar No. 1102199

Counsel of Record

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Legislature*