

United States District Court  
District of Maine

<p><b>PUBLIC INTEREST LEGAL FOUNDATION, INC.</b></p> <p><i>Plaintiff,</i></p> <p>v.</p> <p><b>SHENNA BELLOWS</b>, in her official capacity as the Secretary of State for the State of Maine</p> <p><i>Defendant.</i></p>	<p>Case No. 1:20-cv-00061-GZS</p>
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**Joint Stipulation of Material Facts**

Pursuant to Local Rule 56(b), Plaintiff Public Interest Legal Foundation (“Foundation”) and Defendant Shenna Bellows (the “Secretary”) jointly stipulate to the following material facts for purposes of motions for summary judgment:

1. On or around October 17, 2019, the Foundation sent to the Secretary and the Secretary received the letter filed in this case as Docket Entry 55-1.
2. On October 17, 2019, the parties exchanged the emails filed in this case as Docket Entry 55-2.
3. On or around October 29, 2019, the Foundation sent to the Secretary and the Secretary received the letter filed in this case as Docket Entry 55-3.
4. On or around January 29, 2020, the Foundation sent to the Secretary and the Secretary received the letter filed in this case as Docket Entry 55-4.
5. On or around January 30, 2020, the Secretary sent to the Foundation and the Foundation received the letter filed in this case as Docket Entry 55-5.

6. On or around February 3, 2020, the Foundation sent to the Secretary and the Secretary received the letter filed in this case as Docket Entry 55-6.

7. On or around February 5, 2020, the Secretary sent to the Foundation and the Foundation received the letter filed in this case as Docket Entry 55-7.

8. Prior to the filing of this action, the Foundation requested from the Secretary Maine's "Party/Campaign Use Voter File," which is described in Title 21-A, Section 196-A(1)(B).

9. The Secretary denied the Foundation's request for a copy of Maine's "Party/Campaign Use Voter File."

10. The Secretary has not provided the "Party/Campaign Use Voter File" to the Foundation.

11. Defendant Shenna Bellows is the Secretary of State for the State of Maine. Secretary Bellows is Maine's chief election official and "the coordinator of state responsibilities under the National Voter Registration Act of 1993." 21-A M.R.S. § 180.

12. On June 21, 2021, Maine's Governor signed into law an act that amends 21-A M.R.S. § 196-A. See P.L. 2021, ch. 310 (effective Oct. 18, 2021).

13. Maine's current request form is available at <https://www.maine.gov/sos/cec/elec/data/2021-10%20Request%20Form%20for%20Obtaining%20Data%20from%20CVR.doc>.

14. Maine's current data request instructions are available at <https://www.maine.gov/sos/cec/elec/data/2021-10%20CVR%20Data%20Request%20Form%20Facts%20and%20Instructions.doc>.

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 23, 2022, I electronically filed the foregoing using the Court's ECF system, which will serve notice on all parties.

/s/ Noel H. Johnson  
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