

STATE OF INDIANA) IN THE MARSHALL CIRCUIT COURT
) SS:
COUNTY OF MARSHALL) CAUSE NO.:50C01-2210-PL-31

THOMAS DIXON, in his capacity as the)
Republican Member of the St. Joseph)
County Election Board,)

INDIANA REPUBLICAN STATE)
COMMITTEE, INC.,)

ST. JOSEPH COUNTY REPUBLICAN)
PARTY,)

Plaintiffs,)

v.)

RITA GLENN, in her official capacity as)
Clerk of the St. Joseph County Circuit)
Court and Secretary of the St. Joseph)
County Election Board,)
101 South Main Street)
South Bend, IN 46601)

and)

CHARLES LEONE, in his official)
capacity as the Chair of the St. Joseph)
County Election Board (Democrat))
Halpin Slagh PC)
521 West Colfax Avenue)
South Bend, IN 46601)

Defendants.)

MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

COME NOW Plaintiffs Thomas Dixon, in his capacity as the Republican
Member of the St. Joseph County Election Board (“Dixon”), Indiana Republican

State Committee, Inc. (“IRSC”), St. Joseph County Republican Party (“SJCRP”), and
and for their Motion for Leave to File Amended Complaint, state as follows:

1. Jesse Bohannon, a resident of Marshall County, Indiana, would be directly affected by the outcome of this suit and therefore wishes to be a Plaintiff. His voting interest is harmed since the Defendants’ actions stand to affect or impact the voting results of state and federal positions.
2. A copy of the Plaintiff’s 1st Amended Complaint is attached as Exhibit 1 to this Motion.

WHEREFORE, Plaintiffs, by counsel, respectfully request this Court grant their motion to amend and for all other just and proper relief in the premises.

Respectfully submitted:

JONES LAW OFFICE LLC

/s/ Andrew B. Jones

Andrew B. Jones, #29686-71

Attorney for Plaintiff

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CERTIFICATE OF SERVICE

I certify that this document was served to all counsel of record via the Court’s electronic filing system on the date filed.

/s/ Andrew B. Jones

Andrew B. Jones