

**WISCONSIN CIRCUIT COURT  
WAUKESHA COUNTY**

Concerned Veterans of Waukesha County  
c/o Ken Marek  
745 E. Imperial Dr.  
Hartland WI 53029

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745 E. Imperial Dr.  
Hartland WI 53029

Tom Gudex  
7051 Parkview Ave.  
Lannon WI 53046

Janel Brandtjen  
N52 W16632 Oak Ridge Trail  
Menomonee Falls, WI 53051,

Plaintiffs

v.

Wisconsin Election Commission  
212 Washington Avenue, Third Floor  
P.O. Box 7984  
Madison WI 53707-7984

Defendant

Case Code:  
Case Type:

Case No. \_\_\_\_\_

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**NOTICE OF MOTION AND MOTION FOR TEMPORARY RESTRAINING  
ORDER AND TEMPORARY INJUNCTION**

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**PLEASE TAKE NOTICE** that the above-named Plaintiffs will, through their counsel, Erick G. Kaardal and Michael Gableman, before the November 8, 2022 election, or as soon thereafter as counsel can be heard, before a Waukesha County Circuit Court Judge at

the Waukesha County Courthouse, 515 W Moreland Blvd, Waukesha, WI 53188, bring for hearing a pre-election motion for a temporary restraining order and temporary injunction enjoining WEC's guidance to county clerks and municipal clerks on military absentee ballots in WEC's Military and Overseas Voting Manual (Feb. 2022) and in its Military and Overseas Voting Cheat Sheet (Rev. 2020-10) in conflict with Wisconsin Statutes 6.22(6) and declaring that the military elector absentee ballots be sequestered prior to the November 8, 2022 election so that Wisconsin Statutes 6.22(6) verification can be completed before they are counted.

### **MOTION**

Upon all of the files, records, and proceedings herein, the above-named Plaintiffs hereby move the Court as follows:

1. For an a temporary restraining order and temporary injunction enjoining WEC's guidance to county clerks and municipal clerks on military absentee ballots in WEC's Military and Overseas Voting Manual (Feb. 2022) and in its Military and Overseas Voting Cheat Sheet (Rev. 2020-10) in conflict with Wisconsin Statutes 6.22(6) and declaring that the military elector absentee ballots be sequestered prior to the November 8, 2022 election so that Wisconsin Statutes 6.22(6) verification can be completed before they are counted.
2. Granting such other and further relief as may be deemed just and equitable by the Court.

The Motion will be based upon all of the files, records, and proceedings herein, including, but not limited to, a memorandum of law and affidavits filed in accord with Wisconsin law and local rules, and the arguments of counsel.

Dated: November 4, 2022

*Electronically signed by Erick G. Kaardal*  
Erick G. Kaardal, No. 1035141  
Mohrman, Kaardal & Erickson, P.A.  
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