

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

SUSAN LIEBERT; ANNA HAAS; ANNA POI;
and ANASTASIA FERIN KNIGHT,

Plaintiffs,

v.

WISCONSIN ELECTIONS COMMISSION;
DON M. MILLIS, ROBERT F. SPINDELL,
MARGE BOSTELMANN, ANN S. JACOBS,
MARK L. THOMSEN, *and* JOSEPH J.
CZARNEZKI, *in their official capacities as*
commissioners of the Wisconsin
Elections Commission; Meagan Wolfe,
in her official capacity as administrator
of the Wisconsin Elections Commission;
MICHELLE LUEDTKE, *in her official*
capacity as city clerk for the City of
Brookfield; MARIBETH WITZEL-BEHL, in
her official capacity as city clerk for the
City of Madison; and LORENA RAE
STOTTLER, in her official capacity as city
clerk for the City of Janesville,

Case No. 3:23-cv-00672-jdp

Defendants.

THE WISCONSIN STATE LEGISLATURE'S
SUPPLEMENTAL PROPOSED FINDINGS OF FACT

Defendant Wisconsin State Legislature (the "Legislature"), through its attorneys Troutman Pepper Hamilton Sanders, LLP, submits the following Supplemental Proposed Findings Of Fact in support of its Response In Opposition To Plaintiffs' Motion For Summary Judgment.

1. As noted in the Legislature's Proposed Findings of Fact In Support Of Motion For Summary Judgment, the Dane County Circuit Court recently granted the plaintiffs' motion for summary judgment in *Rise v. Wis. Elections Comm'n*, No.2022CV2446 (Wis. Cir. Ct. Dane Cnty.), holding that the term "address" as used in Wis. Stat. § 6.87 means "a place where a person or organization may be communicated with," Legislature's PFOF ¶ 52 (citing Ex. Q to LeRoy Decl., Dkt.233, *Rise* (Jan. 2, 2024)), and issued an injunction, PFOF ¶ 54 (citing Ex. S to LeRoy Decl., Dkt. 238, *Rise* (Jan. 30, 2024)).

2. On February 5, 2024, the Dane County Circuit Court denied the Legislature's request to stay its decision and injunction pending appeal. Ex. Y to Second LeRoy Decl., Dkt.252, *Rise* (Feb. 5, 2024).

3. On February 27, 2024, the Wisconsin Court of Appeals also rejected the Legislature's stay request. Ex. Z to Second LeRoy Decl., *Rise v. Wis. Elections Comm'n*, No. 2024AP165 (Wis. Ct. App. Feb. 27, 2024).

4. The Wisconsin Court of Appeals then ordered expedited briefing on the merits due to the nature of the issues involved in the case, and the Legislature's opening brief is currently due April 3, 2024. *Id.*; Ex. AA to Second LeRoy Decl.

Dated: March 8, 2024.

Respectfully submitted,

/s/Misha Tseytlin

MISHA TSEYTLIN

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