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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

JOHN C. FRANK,)
GRASSFIRE, LLC,)
)
Plaintiffs,)
)
vs.)
)
ED BUCHANAN, Wyoming Secretary of State,)
LEIGH ANNE MANLOVE, Laramie County)
District Attorney,)
DEBRA LEE, Laramie County Clerk,)
in their official capacities,)
)
)
Defendants.)

Case No. 2:20-cv-00138-NDF

PLAINTIFFS' NOTICE OF CROSS-APPEAL

Plaintiffs John C. Frank and Grassfire, LLC, by and through their undersigned counsel, and pursuant to Federal Rules of Appellate Procedure 3 and 4(a)(3), hereby give notice of cross-appeal. Pursuant to Federal Rule of Appellate Procedure 3(c)(1), Plaintiffs state as follows:

(1) *Parties Cross-Appealing:*

Plaintiffs John C. Frank and Grassfire, LLC.

(2) *Judgment Appealed:*

- (i) Judgment in favor of Defendants Ed Buchanan, Leigh Anne Manlove, and Debra Lee in their official capacities upholding Wyo. Stat. § 22-26-113 as it pertains to the 100-foot no-electioneering buffer zone around absentee polling places during absentee voting;
- (ii) the Court's ruling that it will not entertain the application of the statute to private property.

(3) *Court to which Appeal is Taken:*

The United States Court of Appeals for the Tenth Circuit.

Respectfully submitted,

/s/ Stephen R. Klein
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/s/ Benjamin Barr
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Counsel for Plaintiffs

Dated this 23rd day of August, 2021

/s/ Seth Johnson
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CERTIFICATE OF SERVICE

I, Stephen Klein, hereby certify that on this 23rd day of August, 2021, the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Stephen Klein

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