

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JUDICIAL WATCH, INC.; ILLINOIS  
FAMILY ACTION; BREAKTHROUGH  
IDEAS; and CAROL J. DAVIS,

Plaintiffs,

v.

THE ILLINOIS STATE BOARD OF  
ELECTIONS; and BERNADETTE  
MATTHEWS, in her capacity as the Executive  
Director of the Illinois State Board of Elections,

Defendants,

and

ILLINOIS AFL-CIO and ILLINOIS  
FEDERATION OF TEACHERS,

Intervenor-Defendants.

No. 1:24-cv-01867

Hon. Sara L. Ellis

**UNOPPOSED MOTION FOR LEAVE TO FILE NOTICE OF SUPPLEMENTAL  
AUTHORITY IN SUPPORT OF MOTION TO DISMISS (ECF NO. 57)**

Intervenor-Defendants the Illinois AFL-CIO and the Illinois Federation of Teachers respectfully file this Motion for Leave to File a Notice of Supplemental Authority in Support of their Motion to Dismiss, and state the following in support thereof:

1. Intervenor-Defendants respectfully request leave to file *Republican National Committee v. Benson*, No. 1:24-CV-262, 2024 WL 4539309 (W.D. Mich. Oct. 22, 2024) (“RNC”), as supplemental authority in support of their motion to dismiss.

2. In *RNC*, a court in the Western District of Michigan dismissed a complaint brought by the RNC and individual voters seeking declaratory and injunctive relief for an alleged violation

of the National Voter Registration Act's requirement to "conduct a general program that makes a reasonable effort to remove the names of ineligible voters from the official lists of eligible voters," 52 U.S.C. § 20507(a)(4), which is the same claim Plaintiffs bring here in Count I of their complaint.

3. Intervenor-Defendants wish to bring this decision to the Court's attention because in dismissing the complaint, the *RNC* court found that the plaintiffs lacked standing and failed to state a claim for many of the same reasons Intervenor-Defendants and the State Board have stated in their respective motions to dismiss. *See generally* ECF Nos. 41-1, 57-1, 59, 65.

4. Intervenor-Defendants therefore request leave to file a notice of supplemental authority for the Court's consideration. The proposed notice is attached to this motion as Exhibit 1.

5. Counsel for Intervenor-Defendants contacted counsel for the State Defendants and Plaintiffs. Neither the State Defendants nor the Plaintiffs oppose this motion.

6. WHEREFORE, for the reasons set forth above, Intervenor-Defendants respectfully request that the Court grant leave to file the attached notice.

Dated: October 28, 2024

Respectfully Submitted,

**JENNER & BLOCK LLP**

By:           /s/ Sarah F. Weiss          

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