

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

REPUBLICAN NATIONAL COMMITTEE,
JORDAN JORRITSMA, and EMERSON
SILVERNAIL,

Plaintiffs,

v.

JOCELYN BENSON, in her official capacity as
Michigan Secretary of State; and JONATHAN
BRATER, in his official capacity as Director of
the Michigan Bureau of Elections,

Defendants.

CIVIL ACTION

Case No. 1:24-cv-262-JMB-RSK

Hon. Jane M. Beckering

**PROPOSED INTERVENOR-
DEFENDANTS' MOTION TO
DISMISS PLAINTIFFS'
COMPLAINT**

ORAL ARGUMENT REQUESTED

Proposed Intervenor-Defendants Detroit Disability Power and the Michigan Alliance for Retired Americans hereby move to dismiss Plaintiffs' Complaint in its entirety pursuant to Federal Rule of Civil Procedure 12(b)(1) and 12(b)(6). Plaintiffs lack Article III standing to bring their claim, which in any event fails as a matter of law. The reasons to grant the motion to dismiss are set forth in more detail in the accompanying brief.

WHEREFORE, Proposed Intervenor-Defendants respectfully request that the Court dismiss this action in its entirety and award any other relief that the Court deems appropriate in the circumstances.

Dated: March 22, 2024.

Respectfully submitted,

/s/ Sarah S. Prescott

Sarah S. Prescott (P70510)
SALVATORE PRESCOTT
PORTER & PORTER, PLLC
105 East Main Street
Northville, Michigan 48167
(248) 679-8711
sprescott@spplawyers.com

Aria C. Branch
Christopher Dodge*
Jyoti Jasrasaria
Tina Meng Morrison*
Samuel T. Ward-Packard
ELIAS LAW GROUP LLP
250 Massachusetts Ave, NW, Ste 400
Washington, DC 20001
(202) 968-4490
abranh@elias.law
cdodge@elias.law
jjasrasaria@elias.law
tmengmorrison@elias.law
swardpackard@elias.law

Counsel for Proposed Intervenor-Defendants

*Admission pending