

United States District Court
Western District of Wisconsin

PUBLIC INTEREST LEGAL FOUNDATION, INC.

Plaintiff,

v.

MEAGAN WOLFE, in her official capacity as the
Administrator of the Wisconsin Elections
Commission,

Defendant.

Case No. 3:24-cv-00285-JDP

**PLAINTIFF PUBLIC INTEREST LEGAL FOUNDATION'S
RULE 5.1 NOTICE OF CONSTITUTIONAL CHALLENGE**

Pursuant to Federal Rule of Civil Procedure 5.1(a), Plaintiff Public Interest Legal Foundation ("Foundation") notifies the Court that a constitutional question is presented in this matter. The Foundation further states the following:

1. The Foundation filed the Complaint on April 30, 2024. (Doc. 1.)
2. The Complaint draws into question the constitutionality of a federal statute, namely, the National Voter Registration Act's ("NVRA") statutory exemption, 52 U.S.C. § 20503(b), as applied to the NVRA's Public Disclosure Provision, 52 U.S.C. § 20507(i)(1).
3. The Complaint seeks to have the NVRA's statutory exemption declared invalid, as so applied, under the authority of *Shelby Cty. v. Holder*, 570 U.S. 529 (2013), *City of Boerne v. Flores*, 521 U.S. 507 (1997), and the principles articulated therein.
4. The Complaint further seeks to have the NVRA's Public Disclosure Provision applied to the State of Wisconsin and seeks an order compelling Defendant's compliance therewith.

5. As required by Fed. R. Civ. P. 5.1(a)(2), the Foundation will serve a copy of this notice and the Complaint on the Attorney General of the United States.

Dated: June 27, 2024.

For the Plaintiff Public Interest Legal Foundation:

CRAMER MULTHAUF LLP
Attorneys for Plaintiff,

BY: Electronically signed by Matthew M. Fernholz
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CERTIFICATE OF SERVICE

I hereby certify that on June 27, 2024, I electronically filed the foregoing using the Court's ECF system, which will serve notice on all parties.

/s/ Noel H. Johnson
Noel H. Johnson
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Counsel for Plaintiff

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