

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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REPUBLICAN NATIONAL COMMITTEE,  
DONALD J. TRUMP FOR PRESIDENT 2024, INC., CASE NO. 1:24-cv-00720-PLM-SJB  
MICHIGAN REPUBLICAN PARTY, and RYAN  
KIDD, HON. PAUL L. MALONEY

Plaintiffs,

v

**Plaintiffs' Motion for Summary  
Judgment**

**\*\*\*Oral Argument Requested\*\*\***

GRETCHEN WHITMER, in her official capacity as Governor of Michigan, 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, U.S. SMALL BUSINESS ADMINISTRATION, ISABEL GUZMAN, in her official capacity as Administrator of the Small Business Administration, DEPARTMENT OF VETERANS AFFAIRS, and, DENIS McDONOUGH, in his official capacity as Secretary of Veterans Affairs,

Defendants.

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## **Plaintiffs' Motion for Summary Judgment**

Plaintiffs, the Republican National Committee (“The RNC”), Donald J. Trump for President 2024, Inc. (“Trump Campaign”), the Michigan Republican Party (“MRP”), and Ryan Kidd (“Plaintiffs”), by and through their attorneys, Smith Haughey Rice & Roegge, respectfully move this Court for summary judgment under Fed. R. Civ. P 56, and request an Order providing the following relief:

- A. A declaratory judgment that the State Defendants have violated Michigan Const. 1963, art. 2, § 4(2), as well as MCL 168.509m and MCL 168.509u;
- B. A permanent injunction barring the State Defendants from designating any VRAs without express authorization from the Michigan Legislature;
- C. An order declaring the designation of any VRAs under ED 2023-6, the 2022 Interagency Agreement, the 2023 Memorandum of Understanding (“MOU”) and Memorandum of Agreement (“MOA”), and any future executive directives issued without legislative authorization are invalid;
- D. A declaratory judgment that the SBA and VA are in violation of Section 7 of the NVRA;
- E. A declaratory judgment that the SBA and VA are in violation of the APA;
- F. A permanent injunction barring the SBA and VA from operating as VRAs without express authorization from the Michigan Legislature;
- G. An order declaring the designation of the SBA and VA as VRAs under ED 2023-6, the MOA, and MOU, and any future executive directives issued without legislative authorization is invalid.
- H. Plaintiffs’ reasonable costs and expenses of this action, including attorneys’ fees; and
- I. All other further relief that Plaintiffs may be entitled to.

Date: August 23, 2024

By: /s/ Jonathan B. Koch

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