

Bryan A. Skoric (Wyo. State Bar #6-2834)  
 Dustin N. Slade (Wyo. State Bar #8-7156)  
 Office of the Park County and Prosecuting Attorney  
 1002 Sheridan Avenue  
 Cody, Wyoming, 82414

ATTORNEYS FOR DEFENDANT  
 COLLEEN RENNER, in her official capacity as  
 Park County Clerk.

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF WYOMING**

**EQUALITY STATE POLICY CENTER,**

Plaintiff,

v.

**CHUCK GRAY**, in his official capacity as  
 Wyoming Secretary of State;

**KAYLA WHITE**, in her official capacity as  
 Albany County Clerk;

**LORI SMALLWOOD**, in her official capacity as  
 Big Horn County Clerk;

**CINDY LOVELACE**, in her official capacity as  
 Campbell County Clerk;

**LISA SMITH**, in her official capacity as  
 Carbon County Clerk;

**KAREN RIMMER**, in her official capacity as  
 Converse County Clerk;

**MELISSA JONES**, in her official capacity as  
 Crook County Clerk;

**JULIE FREESE**, in her official capacity as  
 Fremont County Clerk;

**MARY B. FEAGLER**, in her official capacity as  
 Goshen County Clerk;

**BECKY KERSTEN**, in her official capacity as  
 Hot Springs County Clerk;

**JACKIE CAMINO**, in her official capacity as  
 Johnson County Clerk;

**DEBRA LEE**, in her official capacity as  
 Laramie County Clerk;

**APRIL BRUNSKI**, in her official capacity as  
 Lincoln County Clerk;

**TRACY GOOD**, in her official capacity as

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Natrona County Clerk; )  
**BECKY FREEMAN**, in her official capacity as )  
 Niobrara County Clerk; )  
**COLLEEN RENNER**, in her official capacity as )  
 Park County Clerk; )  
**MALCOLM J. ERVIN**, in his official capacity as )  
 Platte County Clerk; )  
**EDA SCHUNK THOMPSON**, in her official )  
 capacity as Sheridan County Clerk; )  
**CARRIE S. LONG**, in her official capacity as )  
 Sublette County Clerk; )  
**CYNTHIA L. LANE**, in her official capacity as )  
 Sweetwater County Clerk; )  
**MAUREEN MURPHY**, in her official capacity as )  
 Teton County Clerk; )  
**AMANDA HUTCHINSON**, in her official )  
 capacity as Uinta County Clerk; )  
**LILY RAKNESS PARRA**, in her official )  
 capacity as Washakie County Clerk; and )  
**BECKY HADLOCK**, in her official capacity as )  
 Weston County Clerk, )

Defendants. )

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**DEFENDANT COLLEEN RENNER’S MOTION TO DISMISS  
 PURSUANT TO FEDERAL RULES OF CIVIL PROCEDURE 12(b)(1)**

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COMES NOW, Defendant Colleen Renner (“Renner”), in her official capacity as Park County Clerk, by and through her undersigned counsel, and hereby submits this Motion to Dismiss Plaintiff Equality State Policy Center’s (“ESPC”) Complaint for Declaratory and Injunctive Relief (“Complaint”) pursuant to Federal Rule of Civil Procedures 12(b)(1) and 12(b)(6).

As set forth in the attached memorandum, Plaintiff’s claims against Defendant Renner are non-justiciable under Article III of the United States Constitution because: (1) Plaintiff lacks standing; (2) any such claims are otherwise unripe; and (3) any such claims are moot.

**Dated this 14th day of July, 2025.**

/s/

Bryan A. Skoric (WSB #6-2834)  
Park County and Prosecuting Attorney

/s/

Dustin N. Slade (WSB No. 8-7156)  
Deputy Park County Attorney  
Park County Attorney's Office  
1002 Sheridan Ave.  
Cody, Wyoming 82414  
(307) 527-2660

ATTORNEYS FOR DEFENDANT  
COLLEEN RENNER, in her official capacity as  
Park County Clerk

### **CERTIFICATE OF SERVICE**

I hereby certify that on the 14<sup>th</sup> day of July, 2025, a copy of the foregoing Motion was electronically filed and service via the CM/ECF e-service to all counsel of record.

/s/

Dustin N. Slade