

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

JILL SWENSON, MELODY MCCURTIS,
MARIA NELSON, BLACK LEADERS
ORGANIZING FOR COMMUNITIES,
and DISABILITY RIGHTS WISCONSIN,
Plaintiffs,

Case No. 3:20-cv-459-wmc

v.

MARGE BOSTELMANN, JULIE M.
GLANCEY, ANN S. JACOBS, DEAN
KNUDSON, ROBERT F. SPINDELL, JR.,
and MARK L. THOMSEN, in their official
capacities as Wisconsin Elections
Commissioners,
Defendants,

REPUBLICAN NATIONAL COMMITTEE
and REPUBLICAN PARTY OF WISCONSIN,
Intervenor-Defendants.

**ANSWER TO SWENSON AMENDED COMPLAINT BY INTERVENOR-
DEFENDANTS REPUBLICAN NATIONAL COMMITTEE AND REPUBLICAN
PARTY OF WISCONSIN**

Intervenor-Defendants, the Republican National Committee and Republican Party of Wisconsin, submit this proposed Answer to Plaintiffs' Amended Complaint (Doc. 37).

INTRODUCTION

1. Intervenor-Defendants admit that COVID-19 presents a serious health issue worldwide and in Wisconsin. The cited article speaks for itself. Intervenor-Defendants otherwise deny the remaining allegations of this paragraph.

2. Intervenor-Defendants admit that there have been a number of infections and deaths in Wisconsin due to COVID-19. The cited article speaks for itself. Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

3. The cited article speaks for itself. Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

4. Intervenor-Defendants admit that COVID-19 presents a serious health issue worldwide and in Wisconsin, but otherwise deny the allegations of this paragraph.

5. The Constitution speaks for itself; Intervenor-Defendants otherwise deny the remaining allegations of this paragraph.

6. Denied.

7. The cited authorities speak for themselves; Intervenor-Defendants otherwise deny the remaining allegations of this paragraph.

8. Denied.

9. Denied.

PARTIES

I. Plaintiffs

10. Intervenor-Defendants lack sufficient information to admit or deny this allegation.

11. Intervenor-Defendants lack sufficient information to admit or deny this allegation.

12. Intervenor-Defendants lack sufficient information to admit or deny this allegation.

13. Intervenor-Defendants lack sufficient information to admit or deny this allegation.

14. Intervenor-Defendants lack sufficient information to admit or deny this allegation.

II. Defendants

15. Admitted.

16. Admitted.

17. Admitted.

JURISDICTION AND VENUE

18. Intervenor-Defendants admit that Plaintiffs purport to bring this action under 42 U.S.C. §§1983 and 1988, and that this Court has jurisdiction over questions arising under federal law.

19. Intervenor-Defendants admit that 42 U.S.C. §1988(b) and 28 U.S.C. §1920 authorize the award of attorney's fees and costs to prevailing parties.

20. Intervenor-Defendants admit that 28 U.S.C. §§2201 and 2202 authorize declaratory relief.

21. Admitted.

22. Admitted.

FACTUAL ALLEGATIONS

I. Defendants and the Wisconsin Elections Commission

23. Wis. Stat. §§5.05(1), (2w) speak for themselves.

24. Admitted.

25. Admitted.

26. Wis. Stat. §5.05(1)(f) speaks for itself.

27. The cited authorities speak for themselves.

28. Wis. Stat. §5.05(16)(c) speaks for itself.

29. Admitted.

II. The Coronavirus Pandemic and Wisconsin's Response

A. COVID-19 and its Health Effects

30. Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph.

31. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

32. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

33. Intervenor-Defendants admit that COVID-19 presents a serious health issue, including to those with underlying health conditions. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

34. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

35. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

36. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

37. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

38. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

B. February and March in Wisconsin

39. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

40. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

41. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

42. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

43. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

44. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

45. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

46. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

47. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

48. Admitted; Intervenor-Defendants note that the Wisconsin Supreme Court has subsequently issued guidance allowing for the resumption of in-person court proceedings with adequate health precautions in place.

49. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

50. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

C. Events Leading up to the April 7 Election

51. This Court's Order in *Democratic Nat'l Comm. v. Bostelmann*, No. 20-cv-249-WMC, speaks for itself.

52. This Court's Order in *Democratic Nat'l Comm. v. Bostelmann*, No. 20-cv-249-WMC, speaks for itself.

53. The Seventh Circuit's order in *Democratic Nat'l Comm. v. Bostelmann*, Nos. 20-1538, 1539, 1545, 1546 (7th Cir. April 3, 2020), speaks for itself.

54. The cited authorities speak for themselves; Intervenor-Defendants admit the remaining allegations of this paragraph.

55. The cited authorities speak for themselves.

56. The United States Supreme Court's order in *Republican Nat'l Comm. v. Democratic Nat'l Comm.*, No. 19A1016, ___ S. Ct. ___, (Apr. 6, 2020), speaks for itself.

57. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

III. Widespread Disenfranchisement in the April 7 Election

58. The cited materials speak for themselves; Intervenor-Defendants otherwise deny the remaining allegations of this paragraph.

59. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

60. Denied.

A. Defendants' Failure to Manage Online Registration and Absentee Ballot Problems Disenfranchised Voters

61. Denied.

62. The cited authorities speak for themselves; Intervenor-Defendants admit the remaining allegations of this paragraph.

63. The cited authorities speak for themselves.

64. The cited authorities speak for themselves; Intervenor-Defendants note that electronic registration is only one method of registration permitted by Wisconsin law.

65. Intervenor-Defendants admit that obtaining a first-time identification card requires a visit to the Wisconsin DMV, but notes that the DMV offices are operating with safety protocols designed to inhibit the spread of COVID-19.

66. The cited authorities speak for themselves.

67. Admitted.

68. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

69. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

70. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

71. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

72. Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph.

73. Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph.

74. The cited materials speak for themselves.

75. The cited materials speak for themselves.

B. Defendants' Failures to Ensure Distribution of Requested Absentee Ballots Disenfranchised Voters

76. Denied.

77. The cited authorities speak for themselves.

78. The cited authorities speak for themselves.

79. The cited authorities speak for themselves.

80. The cited materials speak for themselves.

81. Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph.

82. Admitted.

83. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

84. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

85. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

86. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

87. Denied.

C. Defendants' Failure to Make Adequate Provisions for Voters to Return Absentee Ballots Disenfranchised Voters

88. Wis. Stat. §6.87(6) speaks for itself.

89. The cited authorities speak for themselves.

90. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

91. Intervenor-Defendants lack sufficient information to admit or deny the allegations regarding Plaintiffs Swenson and Nelson. Intervenor-Defendants deny that Defendants acted unlawfully but otherwise lack sufficient information to admit or deny the remaining allegations of this paragraph.

92. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

93. Denied.

94. Intervenor-Defendants deny that Defendants acted unlawfully but otherwise lack sufficient information to admit or deny the remaining allegations of this paragraph.

95. The cited materials speak for themselves; Intervenor-Defendants deny that Defendants acted unlawfully but lack sufficient information to admit or deny the remaining allegations of this paragraph.

D. Defendants' Enforcement of Wis. Stat. §6.87(4)'s Witness Requirement Disenfranchised Voters at High Risk From COVID-19

96. Denied.

97. Wis. Stat. §6.87(4) speaks for itself. Intervenor-Defendants lack sufficient information to admit or deny the allegations regarding Plaintiffs Swenson. Intervenor-Defendants otherwise deny the remaining allegations of this paragraph.

98. Wis. Stat. §6.87(2) speaks for itself. Intervenor-Defendants otherwise admit the remaining allegations of this paragraph.

99. The cited materials speak for themselves. Intervenor-Defendants lack sufficient information to admit or deny the allegations regarding Plaintiffs Swenson's subjective beliefs, but deny that Defendants acted unlawfully.

100. This Court's order speaks for itself.

101. The Seventh Circuit's order speaks for itself.

102. The cited materials speak for themselves; Intervenor-Defendants deny that Defendants acted unlawfully.

103. Intervenor-Defendants deny that Defendants acted unlawfully.

E. Defendants Failed to Safeguard the Availability of In-Person Absentee Voting

104. Intervenor-Defendants admit that in-person absentee ballots are an important and authorized method of voting in Wisconsin and otherwise deny the allegations of this paragraph.

105. Admitted.

106. Intervenor-Defendants deny that Defendants acted unlawfully and otherwise lack sufficient information to admit or deny the allegations of this paragraph.

107. Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph.

108. Intervenor-Defendants deny that Defendants acted unlawfully; they otherwise lack sufficient information to admit or deny the allegations of this paragraph.

109. Wis. Stat. 6.855(1) speaks for itself; Intervenor Defendants deny that Plaintiffs are entitled to an order enjoining this statute.

F. Defendants Failed to Ensure An Adequate Number of Election Day Polling Places

110. Intervenor-Defendants deny that Defendants acted unlawfully; they otherwise lack sufficient information to admit or deny the allegations of this paragraph.

111. Wis. Stat. §5.25(3) speaks for itself.

112. Wis. Stat. §5.25(4)(a) speaks for itself.

113. Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph.

114. Denied.

115. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

116. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

117. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

118. Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph.

119. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

120. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

121. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

122. Intervenor-Defendants deny that Defendants acted unlawfully; they otherwise lack sufficient information to admit or deny the allegations of this paragraph.

123. The cited materials speak for themselves.

124. Wis. Stat. §7.30(2) speaks for itself; Intervenor-Defendants deny that Defendants acted unlawfully.

125. Wis. Stat. §7.30(2) speaks for itself; Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph.

126. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

127. Intervenor-Defendants deny that Defendants acted unlawfully; they otherwise lack sufficient information to admit or deny the allegations of this paragraph.

G. Defendants' Failure to Ensure Safe In-Person Voting Resulted in Widespread Voter Intimidation

128. Intervenor-Defendants deny that Defendants acted unlawfully; they otherwise lack sufficient information to admit or deny the allegations of this paragraph.

129. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

130. Intervenor-Defendants deny that Defendants acted unlawfully; they otherwise lack sufficient information to admit or deny the allegations of this paragraph.

131. Intervenor-Defendants deny that Defendants acted unlawfully; they otherwise lack sufficient information to admit or deny the allegations of this paragraph.

132. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

133. The cited materials speak for themselves.

H. Burdens on Voters with Disabilities

134. Denied.

135. Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph.

136. Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph.

137. Denied.

138. Intervenor-Defendants admit that some disabled voters may require assistive technology; they lack sufficient information to admit or deny the remaining allegations of this paragraph.

139. Intervenor-Defendants deny that Defendants acted unlawfully; they otherwise lack sufficient information to admit or deny the allegations of this paragraph.

140. Intervenor-Defendants deny that Defendants acted unlawfully; they otherwise lack sufficient information to admit or deny the allegations of this paragraph.

IV. Absent Judicial Intervention, These Failures Are Practically Certain to Recur in August and November

141. Intervenor-Defendants admit that COVID-19 is a serious and legitimate concern but deny that Defendants do not have policies or other measures in place to ensure safe voting in the upcoming August and November elections.

A. The Ongoing COVID-19 Pandemic

142. The cited materials speak for themselves.

143. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

144. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

145. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the remaining allegations of this paragraph.

146. The cited materials speak for themselves.

147. Intervenor-Defendants admit that elections are scheduled in August and November; they lack sufficient information to admit or deny the remaining allegations of this paragraph.

B. Turnout in November Will Exacerbate Problems

148. The cited materials speak for themselves; Intervenor-Defendants otherwise deny the allegations in this paragraph.

149. The cited materials speak for themselves; Intervenor-Defendants admit that turnout in the general election is likely to be higher than that of the April primary.

150. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph.

151. This paragraph sets forth a legal conclusion to which no response is required.

152. The cited materials speak for themselves; Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph.

153. Denied.

C. Defendants Have Not Taken Steps Sufficient to Correct the Ongoing Problems with Wisconsin Elections under COVID-19

154. Intervenor-Defendants admit that Defendants have taken steps to implement safe election procedures in light of COVID-19, but otherwise deny the allegations of this paragraph.

155. The cited materials speak for themselves; Intervenor-Defendants deny that Defendants acted unlawfully but otherwise lack sufficient information to admit or deny the allegations of this paragraph.

156. Intervenor-Defendants deny that Defendants acted unlawfully but otherwise lack sufficient information to admit or deny the allegations of this paragraph.

157. The cited materials speak for themselves; Intervenor-Defendants deny that Defendants acted unlawfully but otherwise lack sufficient information to admit or deny the allegations of this paragraph.

158. Denied.

159. Wis. Stat. §§6.86(1)(b) and 7.15(cm) speak for themselves. Intervenor-Defendants deny that Defendants acted unlawfully but otherwise lack sufficient information to admit or deny the allegations of this paragraph.

160. Denied.

161. Denied.

162. Wis. Stat. §6.855 (1) speaks for itself; Intervenor-Defendants otherwise deny the allegations in this paragraph.

163. Denied.

164. The cited materials speak for themselves; Intervenor-Defendants deny that Defendants acted unlawfully but otherwise lack sufficient information to admit or deny the allegations of this paragraph.

165. Denied.

166. The cited materials speak for themselves; Intervenor-Defendants deny that Defendants acted unlawfully but otherwise lack sufficient information to admit or deny the allegations of this paragraph.

167. The cited materials speak for themselves; Intervenor-Defendants deny that Defendants acted unlawfully but otherwise lack sufficient information to admit or deny the allegations of this paragraph.

168. Denied.

V. Plaintiffs' Injuries

Jill Swenson

169. Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph.

170. Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph.

171. Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph.

172. Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph.

173. Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph.

174. Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph.

175. Denied.

Melody McCurtis

176. Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph.

177. Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph.

178. Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph.

179. Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph.

180. Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph.

Maria Nelson

181. Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph.

182. Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph, except they deny that Defendants disenfranchised Ms. Nelson.

183. Denied.

Black Leaders Organizing for Communities

184. Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph.

185. Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph.

186. Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph.

187. Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph, except that they deny that Defendants disenfranchised any voters.

188. Denied.

189. Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph, except that they deny that Defendants disenfranchised any voters.

Disability Rights Wisconsin

190. Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph.

191. Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph.

192. Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph.

193. Intervenor-Defendants lack sufficient information to admit or deny the allegations of this paragraph.

194. Denied.

CLAIMS FOR RELIEF

**Count 1: Violation of Section 11(b) of the Voting Rights Act
(All Plaintiffs)**

195. Intervenor-Defendants reallege and incorporate by reference the responses contained in the preceding paragraphs.

196. Title 52, §10307(b) speaks for itself.

197. Denied.

198. Denied.

199. Denied.

200. Denied.

201. Denied.

202. Denied.

203. Denied.

204. Denied.

205. Denied.

206. Denied.

207. Denied.

**Count 2:
Violation of the Equal Protection Clause of the Fourteenth Amendment to the
U.S. Constitution
(Plaintiff McCurtis, Organizational Plaintiffs)**

208. Intervenor-Defendants reallege and incorporate by reference the responses contained in the preceding paragraphs.

209. The Fourteenth Amendment speaks for itself.

210. The cited authority speaks for itself.

211. Denied.

212. Denied.

213. Denied.

214. Denied.

215. Denied.

216. Denied.

217. Denied.

**Count 3: Violation of the First and Fourteenth Amendments to the U.S. Constitution
(All Plaintiffs)**

218. Intervenor-Defendants reallege and incorporate by reference the responses contained in the preceding paragraphs.

219. Admitted.

220. Denied.

221. Denied.

222. Denied.

223. Denied.

224. Denied.

**Count 4: Violation of the Due Process Clause of the Fourteenth Amendment to the
U.S. Constitution
(Procedural Due Process)
(Plaintiffs Swenson and Nelson, Organizational Plaintiffs)**

225. Intervenor-Defendants reallege and incorporate by reference the responses contained in the preceding paragraphs.

226. The cited authority speaks for itself.

227. The cited authority speaks for itself.

228. Denied.

229. Denied.

230. Denied.

231. Denied.

232. Denied.

233. Denied.

**Count 5: Violation of the Americans with Disabilities Act
(Plaintiffs Swenson and Nelson, Organizational Plaintiffs)**

234. Intervenor-Defendants reallege and incorporate by reference the responses contained in the preceding paragraphs.

235. The cited authority speaks for itself.

236. This paragraph sets forth a legal conclusion to which no response is required.

237. Denied.

238. Denied.

239. Denied.

240. Denied.

241. Denied.

242. Denied.

PRAYER FOR RELIEF

Intervenor-Defendants deny that Plaintiffs are entitled to their requested relief.

AFFIRMATIVE DEFENSES

1. The allegations in the Complaint fail to state a claim for relief.
2. The allegations in the Complaint are unripe and too remote and speculative to support equitable relief.
3. The Counts are barred in whole or in part by the doctrine of abstention.
4. Intervenor-Defendants deny that Plaintiffs are entitled to their requested relief.

Dated: July 14, 2020

Respectfully submitted,

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