

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

<p>DEMOCRATIC NATIONAL COMMITTEE, <i>et al.</i>, Plaintiffs, v. MARGE BOSTELMANN, <i>et al.</i>, Defendants, and REPUBLICAN NATIONAL COMMITTEE, <i>et al.</i>, Intervening Defendants.</p>	<p>Civil Action No. 3:20-cv-249-wmc</p>
<p>SYLVIA GEAR, <i>et al.</i>, Plaintiffs, v. MARGE BOSTELMANN, <i>et al.</i>, Defendants, and REPUBLICAN NATIONAL COMMITTEE, <i>et al.</i>, Intervening Defendants.</p>	<p>Civil Action No. 3:20-cv-278-wmc</p>
<p>CHRYSTAL EDWARDS, <i>et al.</i>, Plaintiffs, v. ROBIN VOS, <i>et al.</i>, Defendants, and REPUBLICAN NATIONAL COMMITTEE, <i>et al.</i>, Intervening Defendants</p>	<p>Civil Action No. 3:20-cv-340-wmc</p>

JILL SWENSON, *et al.*,

Plaintiffs,

v.

MARGE BOSTELMANN, *et al.*,

Defendants,

and

REPUBLICAN NATIONAL COMMITTEE,
et al.,

Intervening Defendants

Civil Action No. 3:20-cv-459-wmc

**DEFENDANTS' ANSWER TO
GEAR, ET AL. V. BOSTELMANN, ET AL., CASE NO. 20-CV-278,
PLAINTIFFS' FIRST AMENDED COMPLAINT
FOR DECLARATORY AND INJUNCTIVE RELIEF**

Defendants Dean Knudson, Julie M. Glancey, Robert F. Spindell, Jr., Mark L. Thomsen, Ann S. Jacobs, Marge Bostelmann and Meagan Wolfe, by their undersigned counsel, answer the Plaintiffs' First Amended Complaint [Case No. 20-cv-278, Dkt. No. 165] as follows:

NATURE OF ACTION

1. Answering paragraph 1 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

2. Answering paragraph 2 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

3. Answering paragraph 3 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

4. Answering paragraph 4 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

5. Answering paragraph 5 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

6. Answering paragraph 6 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

7. Answering paragraph 7 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

8. Answering paragraph 8 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

9. Answering paragraph 9 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

10. Answering paragraph 10 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

11. Answering paragraph 11 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

12. Answering paragraph 12 of the First Amended Complaint, these answering defendants deny the allegations contained in said paragraph.

13. Answering paragraph 13 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

14. Answering paragraph 14 of the First Amended Complaint, these answering defendants affirmatively assert that the statute cited in said paragraph speaks for itself. As to all other allegations contained in said paragraph, these answering defendants lack information sufficient to form a belief as to the allegations and therefore deny same, putting plaintiffs to their strict proof thereon.

15. Answering paragraph 15 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

16. Answering paragraph 16 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

JURISDICTION AND VENUE

17. Answering paragraph 17 of the First Amended Complaint, these answering defendants admit the allegations contained in said paragraph.

18. Answering paragraph 18 of the First Amended Complaint, these answering defendants lack information in order to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

19. Answering paragraph 19 of the First Amended Complaint, these answering defendants admit the allegations contained in said paragraph.

20. Answering paragraph 20 of the First Amended Complaint, these answering defendants admit the allegations contained in said paragraph.

21. Answering paragraph 21 of the First Amended Complaint, these answering defendants admit the allegations contained in said paragraph.

PARTIES

22. Answering paragraph 22 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

23. Answering paragraph 23 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

24. Answering paragraph 24 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

25. Answering paragraph 25 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

26. Answering paragraph 26 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

27. Answering paragraph 27 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

28. Answering paragraph 28 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

29. Answering paragraph 29 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

30. Answering paragraph 30 of the First Amended Complaint, these answering defendants admit the allegations contained in said paragraph.

31. Answering paragraph 31 of the First Amended Complaint, these answering defendants admit the allegations contained in said paragraph.

32. Answering paragraph 32 of the First Amended Complaint, these answering defendants admit the allegations contained in said paragraph.

33. Answering paragraph 33 of the First Amended Complaint, these answering defendants admit the allegations contained in said paragraph.

34. Answering paragraph 34 of the First Amended Complaint, these answering defendants admit the allegations contained in said paragraph.

35. Answering paragraph 35 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

36. Answering paragraph 36 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

37. Answering paragraph 37 of the First Amended Complaint, these answering defendants admit the allegations contained in said paragraph.

38. Answering paragraph 38 of the First Amended Complaint, these answering defendants admit the allegations contained in said paragraph.

39. Answering paragraph 39 of the First Amended Complaint, these answering defendants admit the allegations contained in said paragraph.

40. Answering paragraph 40 of the First Amended Complaint, these answering defendants admit the allegations contained in said paragraph.

41. Answering paragraph 41 of the First Amended Complaint, these answering defendants admit the allegations contained in said paragraph.

42. Answering paragraph 42 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

43. Answering paragraph 43 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

44. Answering paragraph 44 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

45. Answering paragraph 45 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

46. Answering paragraph 46 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

47. Answering paragraph 47 of the First Amended Complaint, these answering defendants lack information in order to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

48. Answering paragraph 48 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

49. Answering paragraph 49 of the First Amended Complaint, these answering defendants admit the allegations contained in said paragraph.

50. Answering paragraph 50 of the First Amended Complaint, these answering defendants admit the allegations contained in said paragraph.

FACTUAL BACKGROUND
The COVID-19 Pandemic

51. Answering paragraph 51 of the First Amended Complaint, these answering defendants admit the allegations contained in said paragraph.

52. Answering paragraph 52 of the First Amended Complaint, these answering defendants admit the allegations contained in said paragraph.

53. Answering paragraph 53 of the First Amended Complaint, these answering defendants admit the allegations contained in said paragraph.

54. Answering paragraph 54 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

55. Answering paragraph 55 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

56. Answering paragraph 56 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

57. Answering paragraph 57 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

58. Answering paragraph 58 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

59. Answering paragraph 59 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

60. Answering paragraph 60 of the First Amended Complaint, these answering defendants admit the allegations contained in said paragraph.

61. Answering paragraph 61 of the First Amended Complaint, these answering defendants admit the allegations contained in said paragraph.

62. Answering paragraph 62 of the First Amended Complaint, these answering defendants affirmatively allege that the orders of the state government and court decision referred to in said paragraph speak for themselves. As to all other allegations contained in paragraph 62, these answering defendants lack information sufficient to form a belief as to said allegations and therefore, deny same, putting plaintiffs to their strict proof thereon.

63. Answering paragraph 63 of the First Amended Complaint, these answering defendants affirmatively allege that the order of the state government referred to in said paragraph speaks for itself. As to all other allegations contained in paragraph 63, these answering defendants

lack information sufficient to form a belief as to said allegations and therefore, deny same, putting plaintiffs to their strict proof thereon.

64. Answering paragraph 64 of the First Amended Complaint, these answering defendants affirmatively allege that the order of the state government referred to in said paragraph speaks for itself. As to all other allegations contained in paragraph 64, these answering defendants lack information sufficient to form a belief as to said allegations and therefore, deny same, putting plaintiffs to their strict proof thereon.

65. Answering paragraph 65 of the First Amended Complaint, these answering defendants affirmatively allege that the order of the state government referred to in said paragraph speaks for itself. As to all other allegations contained in paragraph 65, these answering defendants lack information sufficient to form a belief as to said allegations and therefore, deny same, putting plaintiffs to their strict proof thereon.

The Law and Mechanics of Requesting, Casting, and Returning an Absentee Ballot in Wisconsin

66. Answering paragraph 66 of the First Amended Complaint, these answering defendants admit the allegations contained in said paragraph.

67. Answering paragraph 67 of the First Amended Complaint, these answering defendants admit the allegations contained in said paragraph.

68. Answering paragraph 68 of the First Amended Complaint, these answering defendants admit the allegations contained in said paragraph.

69. Answering paragraph 69 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

70. Answering paragraph 70 of the First Amended Complaint, these answering defendants admit the allegations contained in said paragraph.

71. Answering paragraph 71 of the First Amended Complaint, these answering defendants admit the allegations contained in said paragraph.

Failures to Process Absentee Ballot Requests and Deliver Absentee Ballots to Voters

72. Answering paragraph 72 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

73. Answering paragraph 73 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

74. Answering paragraph 74 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

75. Answering paragraph 75 of the First Amended Complaint, these answering defendants affirmatively assert that the statements contained in the Commission's report speak for themselves. As to all other allegations contained in paragraph 75, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

76. Answering paragraph 76 of the First Amended Complaint, these answering defendants affirmatively assert that the statements contained in the Commission's report speak for themselves. As to all other allegations contained in paragraph 76, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

77. Answering paragraph 77 of the First Amended Complaint, these answering defendants affirmatively assert that the statements contained in the Commission's report speak for themselves. As to all other allegations contained in paragraph 77, these answering defendants lack

information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

78. Answering paragraph 78 of the First Amended Complaint, these answering defendants affirmatively assert that the statements contained in the Commission's report speak for themselves. As to all other allegations contained in paragraph 78, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

79. Answering paragraph 79 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

80. Answering paragraph 80 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

81. Answering paragraph 81 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

82. Answering paragraph 82 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

83. Answering paragraph 83 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

84. Answering paragraph 84 of the First Amended Complaint, these answering defendants deny the allegations contained in said paragraph, putting plaintiffs to their strict proof thereon.

Fail-Safe Remedies for Ballot Preparation and Delivery Failures

85. Answering paragraph 85 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

A. Accessing and Downloading Mail-In Absentee Ballots

86. Answering paragraph 86 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

87. Answering paragraph 87 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

88. Answering paragraph 88 of the First Amended Complaint, these answering defendants admit the allegations contained in said paragraph.

B. Email Delivery of Mail-In Absentee Ballots

89. Answering paragraph 89 of the First Amended Complaint, these answering defendants affirmatively assert that the statements contained in the Commission's publications, website and on the My Vote website speak for themselves. As to all other allegations contained in paragraph 89, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

90. Answering paragraph 90 of the First Amended Complaint, these answering defendants affirmatively assert that the court decision referred to speaks for itself. As to all other allegations contained in paragraph 90, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

91. Answering paragraph 91 of the First Amended Complaint, these answering defendants affirmatively assert that the statements contained in the Commission's publications speak for themselves. As to all other allegations contained in paragraph 91, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

92. Answering paragraph 92 of the First Amended Complaint, these answering defendants affirmatively assert that the statements contained in the Commission's publications speak for themselves. As to all other allegations contained in paragraph 92, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

93. Answering paragraph 93 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

94. Answering paragraph 94 of the First Amended Complaint, these answering defendants admit the allegations contained in said paragraph.

95. Answering paragraph 95 of the First Amended Complaint, these answering defendants admit the allegations contained in said paragraph.

96. Answering paragraph 96 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

97. Answering paragraph 97 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

C. Federal Write-In Absentee Ballots

98. Answering paragraph 98 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

99. Answering paragraph 99 of the First Amended Complaint, these answering defendants affirmatively allege that the statutes and publications cited speak for themselves and no responsive pleading is required as to these allegations. To the extent an answer is required, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

100. Answering paragraph 100 of the First Amended Complaint, these answering defendants affirmatively allege that the statute cited speaks for itself and no responsive pleading is required as to these allegations. To the extent an answer is required, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

101. Answering paragraph 101 of the First Amended Complaint, these answering defendants affirmatively allege that the statutes cited speak for themselves and no responsive pleading is required as to these allegations. To the extent an answer is required, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

102. Answering paragraph 102 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

The Witness Requirement

103. Answering paragraph 103 of the First Amended Complaint, these answering defendants affirmatively allege that the statute and publication cited speak for themselves and no

responsive pleading is required as to these allegations. To the extent an answer is required, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

104. Answering paragraph 104 of the First Amended Complaint, these answering defendants affirmatively allege that the publication cited speaks for itself and no responsive pleading is required as to these allegations. To the extent an answer is required, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

105. Answering paragraph 105 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

106. Answering paragraph 106 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

107. Answering paragraph 107 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

108. Answering paragraph 108 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

109. Answering paragraph 109 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

110. Answering paragraph 110 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

111. Answering paragraph 111 of the First Amended Complaint, these answering defendants affirmatively allege that the court decision cited speaks for itself and no responsive pleading is required as to these allegations. To the extent an answer is required, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

112. Answering paragraph 112 of the First Amended Complaint, these answering defendants affirmatively allege that the statutes cited speak for themselves and no responsive pleading is required as to these allegations. To the extent an answer is required, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

CLAIMS

COUNT ONE

FAILURES TO PREPARE AND DELIVER MAIL-IN ABSENTEE BALLOTS

(All Plaintiffs)

(Denial of Right to Vote in Violation of the First and Fourteenth Amendments to the U.S. Constitution and 42 U.S.C. § 1983)

113. Answering paragraph 113 of the First Amended Complaint, these answering defendants restate each of the foregoing paragraphs of this Answer as if set forth in full.

114. Answering paragraph 114 of the First Amended Complaint, these answering defendants affirmatively allege that the court decisions cited speak for themselves and no responsive pleading is required as to these allegations. To the extent an answer is required, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

115. Answering paragraph 115 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

116. Answering paragraph 116 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

117. Answering paragraph 117 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

118. Answering paragraph 118 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

119. Answering paragraph 119 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

120. Answering paragraph 120 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

121. Answering paragraph 121 of the First Amended Complaint, these answering defendants deny the allegations contained in said paragraph, putting plaintiffs to their strict proof thereon.

122. Answering paragraph 122 of the First Amended Complaint, these answering defendants deny the allegations contained in said paragraph, putting plaintiffs to their strict proof thereon.

COUNT TWO

WITNESS REQUIREMENT

**(Plaintiffs LWVWI, Wisconsin Alliance, Claire Whelan, and Sylvia Gear)
(Undue Burden on the Right to Vote in Violation of the First and Fourteenth Amendments
to the U.S. Constitution and 42 U.S.C. § 1983)**

123. Answering paragraph 123 of the First Amended Complaint, these answering defendants restate each of the foregoing paragraphs of this Answer as if set forth in full.

124. Answering paragraph 124 of the First Amended Complaint, these answering defendants affirmatively allege that the court decisions cited speak for themselves and no responsive pleading is required as to these allegations. To the extent an answer is required, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

125. Answering paragraph 125 of the First Amended Complaint, these answering defendants affirmatively allege that the statute cited speaks for itself and no responsive pleading is required as to these allegations. To the extent an answer is required, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

126. Answering paragraph 126 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

127. Answering paragraph 127 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

128. Answering paragraph 128 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

129. Answering paragraph 129 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

130. Answering paragraph 130 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

131. Answering paragraph 131 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

132. Answering paragraph 132 of the First Amended Complaint, these answering defendants deny the allegations contained in said paragraph, putting plaintiffs to their strict proof thereon.

133. Answering paragraph 133 of the First Amended Complaint, these answering defendants deny the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

COUNT THREE
FAILURES TO PREPARE AND DELIVER MAIL-IN ABSENTEE BALLOTS; WITNESS
REQUIREMENT

(All Plaintiffs)
(Unconstitutional Condition on Right to Vote Compelling Forfeiture of Right to Bodily Integrity in Violation of the Fourteenth Amendment to the U.S. Constitution and 42 U.S.C. § 1983)

134. Answering paragraph 134 of the First Amended Complaint, these answering defendants restate each of the foregoing paragraphs of this Answer as if set forth in full.

135. Answering paragraph 135 of the First Amended Complaint, these answering defendants affirmatively allege that the court decisions cited speak for themselves and no responsive pleading is required as to these allegations. To the extent an answer is required, these

answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

136. Answering paragraph 136 of the First Amended Complaint, these answering defendants affirmatively allege that the court decisions cited speak for themselves and no responsive pleading is required as to these allegations. To the extent an answer is required, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

137. Answering paragraph 137 of the First Amended Complaint, these answering defendants affirmatively allege that the court decisions cited speak for themselves and no responsive pleading is required as to these allegations. To the extent an answer is required, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

138. Answering paragraph 138 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

139. Answering paragraph 139 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

140. Answering paragraph 140 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

141. Answering paragraph 141 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

142. Answering paragraph 142 of the First Amended Complaint, these answering defendants deny the allegations contained in said paragraph, putting plaintiffs to their strict proof thereon.

143. Answering paragraph 143 of the First Amended Complaint, these answering defendants deny the allegations contained in said paragraph, putting plaintiffs to their strict proof thereon.

COUNT FOUR
FAILURE TO PREPARE AND DELIVER MAIL-IN ABSENTEE BALLOTS; WITNESS
REQUIREMENT
(Plaintiffs Katherine Kohlbeck, Diane Fergot, Claire Whelan, and League of Women
Voters of Wisconsin)
(Failure to Provide Reasonable Modifications in Violation of Title II of the Americans with
Disabilities Act, 42 U.S.C. §§ 12131, et seq.)

144. Answering paragraph 144 of the First Amended Complaint, these answering defendants restate each of the foregoing paragraphs of this Answer as if set forth in full.

145. Answering paragraph 145 of the First Amended Complaint, these answering defendants affirmatively allege that the statute cited speaks for itself and no responsive pleading is required as to these allegations. To the extent an answer is required, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

146. Answering paragraph 146 of the First Amended Complaint, these answering defendants affirmatively allege that the statute and court decisions cited speak for themselves and no responsive pleading is required as to these allegations. To the extent an answer is required, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

147. Answering paragraph 147 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

148. Answering paragraph 148 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

149. Answering paragraph 149 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

150. Answering paragraph 150 of the First Amended Complaint, these answering defendants lack information sufficient to form a belief as to the allegations contained in said paragraph and therefore deny same, putting plaintiffs to their strict proof thereon.

151. Answering paragraph 151 of the First Amended Complaint, these answering defendants deny the allegations contained in said paragraph, putting plaintiffs to their strict proof thereon.

152. Answering paragraph 152 of the First Amended Complaint, these answering defendants deny the allegations contained in said paragraph, putting plaintiffs to their strict proof thereon.

153. Answering paragraph 153 of the First Amended Complaint, these answering defendants deny the allegations contained in said paragraph, putting plaintiffs to their strict proof thereon.

PRAYER FOR RELIEF

The Defendants deny that Plaintiffs are entitled to the relief requested.

AFFIRMATIVE DEFENSES

1. The First Amended Complaint fails to state a claim for which relief can be granted and should be dismissed.
2. The allegations and claims in the First Amended Complaint and claims are moot.

Dated: July 20, 2020

LAWTON & CATES, S.C.

Electronically signed by Terrence M. Polich

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