

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

Chrystal Edwards, Terron Edwards, John Jacobson, Catherine Cooper, Kileigh Hannah, Kristopher Rowe, Katie Rowe, Charles Dennert, Jean Ackerman, William Laske, Jan Graveline, Todd Graveline, Angela West, Douglas West, *and all others similarly situated*,

Plaintiffs,

v.

Robin Vos, *in his official capacity as Speaker of the Wisconsin State Assembly*; Scott Fitzgerald, *in his official capacity as Majority Leader of the Wisconsin State Senate*; Wisconsin State Assembly; Wisconsin State Senate; Wisconsin Elections Commission; Marge Bostelmann, Julie M. Glancey, Ann S. Jacobs, Dean Knudson, Robert F. Spindell, Jr., *and* Mark L. Thomsen, *in their official capacities as members of the Wisconsin Elections Commission*, and Meagan Wolfe, *in her official capacity as the Administrator of the Wisconsin Elections Commission*,

Defendants,

and

Republican National Committee *and* Republican Party Of Wisconsin,

Intervenor-Defendants.

No. 3:20-cv-340-wmc
(consolidated with
Nos. 3:20-cv-249-wmc,
3:20-cv-278-wmc, 3:20-
cv-284-wmc, and 3:20-
cv-459-wmc)

**JOINT RESPONSE OF LEGISLATIVE DEFENDANTS AND
INTERVENOR-DEFENDANTS TO *EDWARDS* PLAINTIFFS'
PROPOSED STATEMENT OF RECORD FACTS IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Under this Court's "Procedures to Be Followed on Motions for Injunctive Relief," Defendants Speaker Robin Vos, Majority Leader Scott Fitzgerald, the Wisconsin State Assembly, and the Wisconsin State Senate (collectively, "Legislative Defendants") and Intervenor-Defendants the Republican National Committee and

the Republican Party of Wisconsin (collectively “Intervenor-Defendants”) submit the following joint response to the *Edwards* Plaintiffs’ Statement of Facts in Support of Plaintiffs’ Motion for Preliminary Injunction. Dkt. 417.¹

1. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

2. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

3. Legislative Defendants and Intervenor-Defendants admit that a statewide election was held on April 7, 2020. Legislative Defendants and Intervenor-Defendants dispute the statement that “some voters who voted at the polls contracted the virus” as unsupported by any non-conjectural evidence. Intervenor-Defendants note that it is “difficult to verify,” Dkt. 370 at ¶ 60 (Dr. Murray), where these individuals were infected. Indeed, the Department of Health Services itself explained that it is “not clear how many of the infections may have been caused by the spring election because many of the people had other exposures.” Declaration of Misha Tseytlin (“Tseytlin Decl.”) Ex. 20; *see Swenson* Dkt. 44 at 10 n.34 (Dr. Remington)

¹ All citations to the “Dkt.” refer to the docket in *Democratic National Committee, et al. v. Bostelmann, et al.*, No. 3:20-cv-249-wmc, unless otherwise noted.

(citing same source). Legislative Defendants and Intervenor-Defendants note that the April Election was not associated with an increase in COVID-19 Infection Rates. *See* Tseytlin Decl. Ex. 19 at 1—2, 9; *see also* Tseytlin Decl. Ex. 18 at 1—2.

4. Legislative Defendants and Intervenor-Defendants dispute the statements in this paragraph as unsupported by any non-conjectural evidence. Intervenor-Defendants note that it is “difficult to verify” where these individuals were infected. Indeed, the Department of Health Services itself explained that it is “not clear how many of the infections may have been caused by the spring election because many of the people had other exposures.” *See supra* ¶ 3. Legislative Defendants and Intervenor-Defendants further note that the April Election was not associated with an increase in COVID-19 Infection Rates. *See* Tseytlin Decl. Ex. 19 at 1—2, 9; *see also* Tseytlin Decl. Ex. 18 at 1—2.

5. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

6. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

7. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements

in this paragraph, and add that the materials cited in this paragraph speak for themselves.

8. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

9. This paragraph references an order that speaks for itself.

10. This paragraph references an order that speaks for itself.

11. This paragraph references an order that speaks for itself.

12. This paragraph references an order that speaks for itself.

13. This paragraph references an order that speaks for itself.

14. This paragraph references an order that speaks for itself.

15. This paragraph references an order that speaks for itself.

16. This paragraph references an order that speaks for itself.

17. This paragraph references an order that speaks for itself.

18. This paragraph references an order that speaks for itself.

19. This paragraph references an order that speaks for itself.

20. This paragraph references an order that speaks for itself.

21. This paragraph references an order that speaks for itself.

22. This paragraph references an order that speaks for itself.

23. This paragraph references an order that speaks for itself.

24. Legislative Defendants and Intervenor-Defendants admit the statements in this paragraph.

25. This paragraph references a court ruling that speaks for itself.

26. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves. To the extent this paragraph expresses an opinion regarding a causal connection between the Wisconsin Supreme Court's ruling and positive cases of COVID-19, Legislative Defendants and Intervenor-Defendants dispute that opinion as unsupported by any non-conjectural evidence.

27. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

28. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

29. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

30. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

31. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

32. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

33. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

34. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

35. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements

in this paragraph, and add that the materials cited in this paragraph speak for themselves.

36. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

37. Legislative Defendants and Intervenor-Defendants do not dispute the statements in this paragraph.

38. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

39. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

40. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

41. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements

in this paragraph, and add that the materials cited in this paragraph speak for themselves.

42. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

43. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

44. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

45. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

46. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

47. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

48. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

49. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

50. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

51. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

52. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements

in this paragraph, and add that the materials cited in this paragraph speak for themselves.

53. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

54. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

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56. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

57. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

58. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

59. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

60. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

61. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

62. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

63. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements

in this paragraph, and add that the materials cited in this paragraph speak for themselves.

64. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves. Legislative Defendants and Intervenor-Defendants note that the April Election was not associated with an increase in COVID-19 Infection Rates. *See supra* ¶ 3.

65. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

66. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

67. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

68. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

69. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

70. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

71. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

72. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

73. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

74. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

75. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

76. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

77. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

78. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

79. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

80. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the reason for Chrystal and Terron Edwards' decision to choose absentee voting. To the extent this paragraph expresses an opinion regarding the risk of in-person voting, the Legislative Defendants and Intervenor-Defendants dispute that opinion. *See supra* ¶ 3.

81. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

82. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

83. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

84. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements regarding the determination of Chrystal and Terron Edwards regarding in person voting. To the extent this paragraph expresses an opinion regarding the risk of in-person voting, the Legislative Defendants and Intervenor-Defendants dispute that opinion. *See supra* ¶ 3.

85. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph. By way of further answer, Legislative Defendants and Intervenor-Defendants state that decisions regarding the number of voting stations were attributable to high-ranking local officials—who are not named as defendants here—not from the Wisconsin Election Commission (“Commission”) or the Legislative Defendants. For example, Milwaukee drastically cut and consolidated its polling locations on Election Day for no sufficient reason. Dkt. 198-1 ¶ 36; *Swenson* Dkt. 37 ¶ 3; *see* Dkt. 413, Deposition of Robert Spindell 138:17–140:10 (hereinafter “Spindell Dep.”); *see* Dkt. 227-1 at 1 (hereinafter “Wolfe Memo”); Tseytlin Decl. Ex. 21; *see also*

Second Deposition of Meagan Wolfe 176:8-15 (hereinafter “Wolfe Dep. II”) (noting municipalities are responsible for their own consolidation decisions about polling places, including for April 7 election). For example, Milwaukee drastically cut and consolidated its polling locations on Election Day for no sufficient reason. *Id.* In contrast, other major municipalities in Wisconsin, like Madison, did not unreasonably close polling locations and so did not experience these Election Day difficulties. *See* Wolfe Memo at 7–8; Tseytlin Decl. Ex. 22; Dkt. 37 ¶ 122.

86. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

87. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

88. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

89. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

90. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

91. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

92. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

93. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

94. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

95. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

96. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

97. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

98. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

99. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

100. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

101. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

102. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

103. This paragraph references a court ruling that speaks for itself.

104. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph. To the extent this paragraph expresses an opinion regarding the risk of in-person voting, Legislative Defendants and Intervenor-Defendants dispute that opinion. *See supra*, ¶ 3.

105. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

106. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

107. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

108. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements regarding William Laske's state of mind. Legislative Defendants and Intervenor-Defendants dispute that the failure to receive an absentee ballot prevents an individual from exercising his right to vote, and note that in-person voting was conducted safely during Wisconsin's April Election. *See supra* ¶ 3.

109. Legislative Defendants and Intervenor-Defendants dispute that the failure to receive an absentee ballot prevents an individual from exercising his right to vote, and note that in-person voting was conducted safely during Wisconsin's April Election. *See supra* ¶ 3.

110. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

111. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

112. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

113. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

114. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

115. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

116. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

117. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements

in this paragraph, and add that the materials cited in this paragraph speak for themselves.

118. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

119. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph. By way of further answer, Legislative Defendants and Intervenor-Defendants state that safe, in-person voting was available during Wisconsin's April Election. *See supra*, ¶ 3.

120. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

121. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

122. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

123. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

124. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

125. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

126. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

127. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to whether Kileigh Hannah decided to vote. To the extent this paragraph expresses an opinion regarding the risk of in-person voting, the Legislative Defendants and Intervenor-Defendants dispute that opinion. *See supra* ¶ 3.

128. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph. By way of further answer, Legislative Defendants and Intervenor-Defendants state that the situation could have been remedied by casting a vote in person, which could have been done safely. *See supra* ¶ 3.

129. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to whether Kileigh Hannah decided to vote. To the extent this paragraph expresses an opinion regarding the risk

of in-person voting, the Legislative Defendants and Intervenor-Defendants dispute that opinion. *See supra* ¶ 3.

130. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

131. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

132. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

133. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

134. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

135. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

136. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements

in this paragraph. Legislative Defendants and Intervenor-Defendants note that the April Election was not associated with an increase in COVID-19 Infection Rates. *See supra* ¶ 3.

137. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

138. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

139. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

140. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

141. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

142. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph. Legislative Defendants and Intervenor-Defendants note that the

April Election was not associated with an increase in COVID-19 Infection Rates. *See supra* ¶ 3.

143. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

144. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

145. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to whether Kileigh Hannah decided to vote. To the extent this paragraph expresses an opinion regarding the risk of in-person voting, the Legislative Defendants and Intervenor-Defendants dispute that opinion. *See supra* ¶ 3.

146. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

147. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

148. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

149. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

150. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

151. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph. Legislative Defendants and Intervenor-Defendants note that the April Election was not associated with an increase in COVID-19 Infection Rates. *See supra* ¶ 3.

152. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

153. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

154. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to when Jean Ackerman learned of Governor Evers' order and a court ruling, and add that the order and ruling speak for themselves.

155. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief regarding Jean Ackerman's decision to vote. To the extent this paragraph expresses an opinion regarding the risk of in-person voting, the Legislative Defendants and Intervenor-Defendants dispute that opinion. *See supra* ¶ 3.

156. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief regarding Jean Ackerman's decision to vote. To the extent this paragraph expresses an opinion regarding the risk of in-person voting, the Legislative Defendants and Intervenor-Defendants dispute that opinion. *See supra* ¶ 3.

157. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

158. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

159. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph and add that the order cited in this paragraph speaks for itself.

160. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

161. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

162. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph. Legislative Defendants and Intervenor-Defendants note that John Jacobson could have exercised his right to vote safely in person. *See supra* ¶ 3.

163. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

164. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

165. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

166. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

167. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements

in this paragraph, and add that the materials cited in this paragraph speak for themselves.

168. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

169. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

170. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

171. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

172. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

173. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

174. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements

in this paragraph. Legislative Defendants and Intervenor-Defendants note that the April Election was not associated with an increase in COVID-19 Infection Rates. *See supra* ¶ 3.

175. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to Douglas and Angela West's decision not to vote in person. To the extent this paragraph expresses an opinion regarding the risk of in-person voting, Legislative Defendants and Intervenor-Defendants dispute that opinion. *See supra* ¶ 3.

176. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

177. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

178. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

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181. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

182. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves. Legislative Defendants and Intervenor-Defendants note that the April Election was not associated with an increase in COVID-19 Infection Rates. *See supra* ¶ 3.

183. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

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211. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

212. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the reason for Chrystal and Terron Edwards' decision to choose absentee voting. To the extent this paragraph

expresses an opinion regarding the risk of in-person voting, the Legislative Defendants and Intervenor-Defendants dispute that opinion. *See supra* ¶ 3.

213. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

214. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph. Legislative Defendants and Intervenor-Defendants note that the April Election was not associated with an increase in COVID-19 Infection Rates. *See supra* ¶ 3.

215. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

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220. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves. By way of further answer, Legislative Defendants and Intervenor-Defendants state that decisions regarding the number of voting stations were attributable to high-ranking local officials—who are not named as defendants here—not from the Commission or the Legislative Defendants. Dkt. 198-1 ¶ 36; *Swenson* Dkt. 37 ¶ 3; see Spindell Dep. 138:17–140:10; Wolfe Memo at 7–8; Tseytlin Decl. Ex. 21 (noting “[d]iscussion of Milwaukee . . . Polling Place Consolidation” on agenda); see also Wolfe Dep. II 176:8-15 (noting municipalities are responsible for their own consolidation decisions about polling places, including for April 7 election). For example, Milwaukee drastically cut and consolidated its polling locations on Election Day for no sufficient reason. *Id.*

221. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves. By way of further answer, Legislative Defendants and Intervenor-Defendants state that decisions regarding the number of voting stations were attributable to high-ranking local officials—who are not named as defendants here—not from the Commission or the Legislative Defendants. Dkt. 198-1 ¶ 36; *Swenson* Dkt. 37 ¶ 3; *see* Spindell Dep. 138:17–140:10; Wolfe Memo at 7–8; Tseytlin Decl. Ex. 21 (noting “[d]iscussion of Milwaukee . . . Polling Place Consolidation” on agenda); *see also* Wolfe Dep. II 176:8-15 (noting municipalities are responsible for their own consolidation decisions about polling places, including for April 7 election). For example, Milwaukee drastically cut and consolidated its polling locations on Election Day for no sufficient reason. *Id.*

222. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves. By way of further answer, Legislative Defendants and Intervenor-Defendants note that turnout for the April Election was exceptionally high, with 1,555,263 votes cast, *see* Tseytlin Decl. Ex. 16, representing 34.3% of eligible voters, *see* Tseytlin Decl. Ex. 17 (providing Wisconsin’s estimated voting-age population as 4,524,066). Moreover, the election was not associated with an increase in COVID-19 Infection Rates. *See supra* ¶ 3.

223. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

224. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

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228. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements

in this paragraph, and add that the materials cited in this paragraph speak for themselves. By way of further answer, Legislative Defendants and Intervenor-Defendants state that the Commission has elected to mail absentee-ballot applications and informational material to “all voters without an active absentee request on file,” making it even easier for voters to vote via absentee ballot for the November 2020 Election. Tseytlin Decl. Ex. 28; Tseytlin Decl. Ex. 29.

229. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

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237. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

238. This paragraph references a transcript that speaks for itself.

239. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

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248. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves. By way of further answer, Legislative Defendants and Intervenor-Defendants note that mail-in absentee voting is “the largest source of potential voter fraud.” Tseytlin Decl. Ex. 44.

249. Legislative Defendants and Intervenor-Defendants dispute the statements in this paragraph. Obtaining a photo ID is easy because acceptable IDs

come in “several forms” that many voters “may already have.” Tseytlin Decl. Ex. 10. For example, “[a]nyone with a valid Wisconsin driver license or Wisconsin state ID card,” among numerous other common documents, “already has the photo ID they need for voting purposes.” *Id.*

250. This paragraph refers to a court decision and the operation of a state statute, which speak for themselves.

251. Legislative Defendants and Intervenor-Defendants do not dispute that Administrator Wolfe’s testimony includes this statement. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

252. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

253. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves.

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255. Legislative Defendants and Intervenor-Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph, and add that the materials cited in this paragraph speak for themselves. By way of further answer, Legislative Defendants and Intervenor-Defendants state that decisions regarding the number of voting stations were attributable to high-ranking local officials—who are not named as defendants here—not from the Commission or the Legislative Defendants. *See supra* ¶ 85.

Dated, July 20, 2020

Respectfully submitted,

/s/ Patrick Strawbridge

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CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of July, 2020, a true and accurate copy of the foregoing was served via the Court's CM/ECF system upon all counsel of record.

/s/ Misha Tseytlin

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