STATE OF MICHIGAN IN THE SUPREME COURT

ANGELIC JOHNSON and, LINDA LEE TARVER,

MSC No. 162286

Petitioners,

VS.

JOCELYN BENSON, in her official capacity as Michigan Secretary of State; JEANNETTE BRADSHAW, in her official capacity as Chair of the Board of State Canvassers for Michigan; BOARD OF STATE CANVASSERS FOR MICHIGAN; and GRETCHEN WHITMER, in her official capacity as Governor of Michigan,

Respondents,

and

MICHIGAN DEMOCRATIC PARTY, and CITY OF DETROIT

Intervenors-Respondents,

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CITY OF DETROIT'S MOTION FOR IMMEDIATE CONSIDERATION

Pursuant to MCR 7.311(E), Proposed Intervenor, the City of Detroit (the "City"), by and through counsel, respectfully moves for immediate and expedited consideration of its motion to intervene. In support of its motion, the City states as follows:

- 1. Along with this motion, the City is filing its motion to intervene as a defendant in this matter.
- 2. The bulk of Petitioners' allegations in this lawsuit relate to the purported actions or inactions of the City at the TCF Center.
- 3. Petitioners have asked this Court for extraordinary and unconstitutional relief which would effectively reverse the results of duly conducted federal, state and local elections, and disenfranchise hundreds of thousands of the City's residents.
- 4. The City is uniquely positioned to defend the conduct of its election officials, and the constitutional rights of its citizens.

5. This Court should immediately consider the motion to intervene and decide whether the City may intervene to protect its substantial interests in this litigation.

Respectfully submitted,

December 1, 2020

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CERTIFICATE OF SERVICE

I hereby certify that on December 1, 2020, I electronically filed the foregoing paper with the Clerk of the court using the electronic filing system, which sends notice to all counsel of record.

FINK BRESSACK

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