

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

LOUIE GOHMERT, TYLER BOWYER,
NANCY COTTLE, JAKE HOFFMAN,
ANTHONY KERN, JAMES R. LAMON,
SAM MOORHEAD, ROBERT
MONTGOMERY, LORAINÉ
PELLEGRINO, GREG SAFSTEN, KELLI
WARD and MICHAEL WARD,

Plaintiffs,

v.

THE HONORABLE MICHAEL R. PENCE,
VICE PRESIDENT OF THE UNITED
STATES, IN HIS OFFICIAL CAPACITY.

Defendant,

MICHELE LUNDGREN, MARIAN
SHERIDAN, MESHAWN MADDOCK,
MARI-ANN HENRY, AND
AMY FACCHINELLO, IN THEIR
OFFICIAL CAPACITY AS
PRESIDENTIAL ELECTORS,
REPRESENTING THEIR RESPECTIVE
STATES.

Intervenors.

Civil Action No.
6:20-cv-00660-JDK

**INTERVENORS' MICHELE
LUNDGREN ET.AL.'S BRIEF
IN SUPPORT OF
EMERGENCY RELIEF
REQUESTED BY
PLAINTIFFS AND IN
RESPONSE TO DEFENDANT
AND OTHERS.**

(Election Matter)

**INTERVENORS' BRIEF IN SUPPORT OF EMERGENCY RELIEF
REQUESTED BY PLAINTIFFS AND
IN RESPONSE TO BRIEF OF DEFENDANT AND OTHERS**

TO THE HONORABLE COURT:

Michele Lundgren, Marian Sheridan, Meshawn Maddock Mari-Ann Henry and Amy Facchinello in their official capacities as Presidential Electors for the State of Michigan (hereinafter referred to as the “Michigan Electors”) submit the following Brief in support of the emergency relief requested by Plaintiffs and in response to the Brief of Defendant (Dkt. #18), filed December 31, 2020, and the briefing of the other Amicus and others (Dkt. ##19 22), filed December 31, 2020, and say:

I.

The Michigan Electors Intervenors fully support and affirm “Plaintiffs’ Emergency Motion for Expedited Declaratory Judgment and Emergency Injunctive Relief” (Dkt. #2) filed on December 28, 2020 in this action and incorporate and adopt the arguments and authorities stated therein for all purposes and urged the Court to affirm the reasoning and arguments contained therein. Intervenors, without restating and re-arguing points of law already addressed in Plaintiffs’ Brief, fully support and affirm Plaintiffs’ Brief in response to the Brief of Defendant and others (Dkt. #30) filed in this action on January 1, 2020 and urge the Court to adopt and affirm the reasoning and issues addressed therein. Because the briefing done by Plaintiffs is thoroughly accurate and complete, in the interest of the time of the Court,

Intervenors will not restate and re-argue points of law and authorities which have been fully and adequately briefed by Plaintiffs' briefing on all points and in response to Defendant and all others.

For these reasons, the Michigan Electors Intervenors pray that the Court grant the relief requested by Plaintiffs and by the Michigan Electors Intervenors as requested in Plaintiffs' complaint, emergency motion and briefing submitted in this action.

Respectfully submitted,

By: /s/ Charles Bundren

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CERTIFICATE OF ELECTRONIC FILING

The undersigned hereby certifies that this document has been filed by electronic means through the court's CM/ECF electronic filing system on the date indicated below.

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CERTIFICATE OF SERVICE

This is to certify that on this 1st day of January 2021 a true and correct copy of the foregoing document was served in accordance with the Federal Rules of Civil Procedure and the United States District Court for the Eastern District of Texas Local Rules on all legal counsel of record for any party and all pro se parties by serving the following:

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By: /s/ Charles Bundren

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