

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

Donald J. Trump, Candidate for President
of the United States of America,

Plaintiff,

vs.

Case No. 2:-20-cv-01785-BHL

The Wisconsin Elections Commission, and its
members, Ann S. Jacobs, Mark L. Thomsen,
Marge Bostelman, Dean Knudson, Robert F.
Spindell, Jr., in their official capacities, Scott
McDonell in his official capacity as the Dane
County Clerk, George L. Christenson in his
official capacity as the Milwaukee County Clerk,
Julietta Henry in her official capacity as the
Milwaukee Election Director, Claire Woodall-
Vogg in her official capacity as the Executive
Director of the Milwaukee Election Commission,
Mayor Tom Barrett, Jim Owczarski, Mayor Satya
Rhodes-Conway, Maribeth Witzel-Behl, Mayor
Cory Mason, Tara Coolidge, Mayor John
Antaramian, Matt Krauter, Mayor Eric Genrich,
Kris Teske, in their official Capacities; Douglas J.
La Follette, Wisconsin Secretary of State, in his
official capacity, and Tony Evers, Governor of
Wisconsin, in his Official capacity.

Defendants.

PLAINTIFF’S MOTION FOR EXPEDITED DISCOVERY

Plaintiff Donald J. Trump (“Plaintiff”), by his undersigned attorneys, moves for expedited discovery and, in support of this motion, states as follows:

1. Plaintiff incorporates the allegations set forth in his *Complaint for Expedited Declaratory and Injunctive Relief Pursuant to Article II of the United States Constitution* (“Complaint”).¹

2. Plaintiff seeks an expedited order from the Court identifying and declaring the constitutional violations that have occurred as described in the Complaint.

3. In light of the limited time in which the Court has to address the Complaint, Plaintiff has requested a hearing on his *Motion for Expedited Declaratory and Injunctive Relief* (the “Motion”) within forty-eight (48) hours of the filing of the Motion or such other shortened time period which the Court determines to be reasonable under the circumstances and which will permit all parties an opportunity for appeals at all levels of the federal judicial system to be completed by December 11, 2020.

4. Accordingly, Plaintiff requests that the Court enter an order permitting expedited discovery as follows:

- A. Requiring Defendant the Wisconsin Elections Commission to respond to Plaintiff’s Requests for Production to the Wisconsin Elections Commission, a copy of which is attached hereto as **Exhibit A**, and to produce all requested documents no later than 3 days from the entry of an order on this Motion or at least 12 hours before a hearing on the Motion, whichever is soonest.
- B. Requiring Defendant the Wisconsin Elections Commission to respond to Plaintiff’s Requests for Admission to the Wisconsin Elections Commission, a copy of which is attached hereto as **Exhibit B** no later than 3 days from the entry of an order on this Motion or at least 12 hours before a hearing on the Motion, whichever is soonest.
- C. Requiring Defendant Mayor Tom Barrett in his official capacity to respond to Plaintiff’s Request for Admission to Mayor Tom Barrett in his Official Capacity a copy of which is attached hereto as **Exhibit C** no later than 3 days from the entry of an order on this Motion or at least 12 hours before a hearing on the Motion, whichever is soonest.

¹ All capitalized terms not defined herein shall have the meaning specified in the Complaint.

4. The expedited discovery is reasonable, limited, and targeted towards promoting the expeditious and efficient resolution of the Motion and this matter.

THEREFORE, Plaintiff Donald J. Trump requests that the Court enter an order allowing expedited discovery as outlined above, and grant all other just and proper relief.

Respectfully Submitted,

KROGER, GARDIS & REGAS, LLP

/s/ William Bock, III

William Bock III, Indiana Attorney No. 14777-49

James A. Knauer, Indiana Attorney No. 5436-49

Kevin D. Koons, Indiana Attorney No. 27915-49

ATTORNEYS FOR PLAINTIFF DONALD J. TRUMP

KROGER, GARDIS & REGAS, LLP
111 Monument Circle, Suite 900
Indianapolis, IN 46204
Phone: (317) 692-9000

CERTIFICATE OF SERVICE

A copy of the foregoing document was served upon all parties' counsel of record via this Court's CM/ECF service on this 4th day of December, 2020.

/s/ William Bock, III