

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

LEAGUE OF WOMEN VOTERS OF WISCONSIN,

Plaintiff,

v.

DEAN KNUDSON, JULIE M. GLANCEY,
ROBERT F. SPINDELL, JR., MARK L.
THOMSEN, ANN S. JACOBS,
MARGIE BOSTELMANN, in their official capacity
as members of the Wisconsin Elections Commission,
and MEAGAN WOLFE, in her official capacity as
the Administrator of the Wisconsin Elections
Commission,

Case No: 21-cv-805

Defendants.

**AMENDED ANSWER OF DEFENDANTS, IN THEIR OFFICIAL CAPACITIES,
TO COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF**

NOW COME Defendants Dean Knudson, Julie M. Glancey, Robert F. Spindell, Jr., Mark L. Thomsen, Ann S. Jacobs, and Marge Bostelmann, in their official capacities as members of the Wisconsin Elections Commission, and Defendant Meagan Wolfe, in her official capacity as the Administrator of the Wisconsin Elections Commission, by their undersigned counsel, and as their Amended Answer to the Complaint for Declaratory and Injunctive Relief (“Complaint”), admit, deny, and allege as follows:

RESTATEMENT OF ANSWER

1. Defendants restate and incorporate by reference herein the Answer they filed, in their official capacities, to the Complaint, on March 1, 2022, as Docket No. 15. Defendants file this Amended Answer for the purpose of adding the following additional Affirmative Defenses.

AFFIRMATIVE DEFENSES

5. Upon information and belief, Plaintiff lacks standing and/or capacity to sue.
6. Plaintiff's claims may be barred, in whole or in part, by the doctrine of qualified immunity.
7. Upon information and belief, Plaintiff's claims may be barred by the doctrines of laches, waiver, estoppel, and/or unclean hands.
8. Plaintiff may have failed to join parties whose joinder is required under Fed. R. Civ. P. 19.

Dated this 10th day of March, 2022.

DEWITT LLP

By: /s/ Jon P. Axelrod

Jon P. Axelrod (WI Bar No. 1012131)
Deborah C. Meiners (WI Bar No. 1074114)
Two East Mifflin Street, Suite 600
Madison, WI 53703-2865
608-255-8891
jpa@dewittllp.com
dcm@dewittllp.com

Attorneys for Defendants