

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN

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SUSAN LIEBERT, ANNA HAAS, ANNA POI,  
*and* ANASTASIA FERIN KNIGHT,

*Plaintiffs,*

*v.*

WISCONSIN ELECTIONS COMMISSION,  
DON M. MILLIS, ROBERT F. SPINDELL,  
MARGE BOSTELMANN, ANN S. JACOBS,  
MARK L. THOMSEN, *and* JOSEPH J.  
CZARNEZKI, *in their official capacities as*  
*commissioners of the Wisconsin*  
*Elections Commission*, Meagan Wolfe,  
*in her official capacity as administrator*  
*of the Wisconsin Elections Commission*,  
MICHELLE LUEDTKE, *in her official*  
*capacity as city clerk for the City of*  
*Brookfield*, MARIBETH WITZEL-BEHL, *in*  
*her official capacity as city clerk for the*  
*City of Madison*, *and* LORENA RASE  
STOTTLER, *in her official capacity as city*  
*clerk for the City of Janesville*,

Case No. 3:23-cv-00672-slc

*Defendants.*

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**THE WISCONSIN STATE LEGISLATURE'S  
MOTION FOR SUMMARY JUDGMENT OR,  
IN THE ALTERNATIVE, TO STAY**

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Under Rule 56 of the Federal Rules of Civil Procedure and this Court's inherent authority to stay a case, Intervenor Defendant the Wisconsin Legislature ("Legislature") hereby submits this Motion For Summary Judgment Or, In The Alternative, To Stay. The Legislature sets forth the grounds for this Motion in its Memorandum Of Law In Support Of Its Motion for Summary Judgment Or, In The

Alternative, To Stay, which it has filed contemporaneously with this Motion. The Legislature has also contemporaneously filed with this Motion its Proposed Findings Of Fact, as well as a supporting declaration, with exhibits. For the reasons set forth in the Legislature's supporting Memorandum, the Legislature respectfully requests that this Court grant its Motion and enter judgment in favor of the Legislature on Count I of the Complaint for violation of the Voting Rights Act of 1965 and Count II of the Complaint for violation of the Civil Rights Act of 1964. Alternatively, if this Court does not enter judgment in the Legislature's favor, the Legislature respectfully requests a stay of the Court's decision pursuant to the Court's inherent authority.

Dated: February 16, 2024.

Respectfully submitted,

/s/ Misha Tseytlin

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 16, 2024, 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*

MISHA TSEYTLIN