

STATE OF MICHIGAN
IN THE COURT OF CLAIMS

ROBERT LaBRANT, ANDREW
BRADWAY, NORAH MURPHY, and
WILLIAM NOWLING,

Plaintiffs,

-vs-

JOCELYN BENSON, in her official
capacity as Secretary of State,

Defendant,

and

DONALD J. TRUMP,

Proposed-Intervenor.

Mark Brewer (P35661)
Rowan E. Conybeare (P86571)
GOODMAN ACKER P.C.
Attorneys for Plaintiffs
17000 W. Ten Mile Road
Southfield, MI 48975
(248) 483-5000
mbrewer@goodmanacker.com

FREE SPEECH FOR PEOPLE
Ronald Fein (Proposed *pro hac vice*)
Amira Mattar (Proposed *pro hac vice*)
Courtney Hostetler (Proposed *pro hac vice*)
John Bonifaz (Proposed *pro hac vice*)
Ben Clements (Proposed *pro hac vice*)
Attorneys for Plaintiffs
1320 Centre St. #405
Newton, MA 02459
(617) 244-0234

**PROPOSED-INTERVENOR'S MOTION
FOR SUMMARY DISPOSITION AND
PROOF OF SERVICE**

FILE NO.: 23-000137-MZ

HON. JAMES ROBERT REDFORD

David A. Kallman (P34200)
Stephen P. Kallman (P75622)
KALLMAN LEGAL GROUP, PLLC
Attorneys for Proposed-Intervenor
5600 W. Mount Hope Hwy.
Lansing, MI 48917
(517) 322-3207
dave@kallmanlegal.com
steve@kallmanlegal.com

Michael Columbo, *pro hac vice* coming
Mark P. Meuser, *pro hac vice* coming
Zachary Kramer, *pro hac vice* coming
DHILLON LAW GROUP, INC.
Attorney for Proposed-Intervenor
177 Post St., Suite 700
San Francisco, CA 94108
(415) 433-1700
mcolumbo@dhillonlaw.com
mmeuser@dhillonlaw.com

Heather S. Meingast (P55439)
Erik A. Grill (P64713)
Assistant Attorneys General
Attorneys for Defendant
P.O. Box 30736
Lansing, MI 48909
(517) 335-7659
meingasth@michigan.gov
grille@michigan.gov

PROPOSED-INTERVENOR’S MOTION FOR SUMMARY DISPOSITION

NOW COMES the above-named Proposed-Intervenor, Donald J. Trump, by and through his legal counsel, and moves this Honorable Court for Summary Disposition pursuant to MCR 2.116(C)(4), 2.116(C)(8), and MCR 2.116(C)(10), for all the reasons as stated in the attached Brief in Support which are incorporated herein in full. Proposed-Intervenor sought concurrence for his motion pursuant to Local Rule 2.119(A)(2) on October 16, 2023. Concurrence was not received, thus necessitating this motion.

WHEREFORE, Proposed-Intervenor respectfully requests that this Honorable Court grant his Motion for Summary Disposition, dismiss Plaintiffs’ Complaint in its entirety with prejudice, find Plaintiffs’ Complaint to be frivolous, devoid of merit, and filed for the purpose of harassment, and grant all other relief as the Court deems just and appropriate.

KALLMAN LEGAL GROUP, PLLC

DATED: October 16, 2023.

/s/ David A. Kallman
David A. Kallman (P34200)
Attorney for Proposed-Intervenor,
Donald J. Trump

DATED: October 16, 2023.

/s/ Stephen P. Kallman
Stephen P. Kallman (P75622)
Attorney for Proposed-Intervenor,
Donald J. Trump

DHILLON LAW GROUP, INC.

DATED: October 16, 2023.

/s/ Michael Columbo
Michael Columbo
Attorney for Proposed-Intervenor,
Donald J. Trump

DATED: October 16, 2023.

/s/ Mark P. Meuser
Mark P. Meuser
Attorney for Proposed-Intervenor,
Donald J. Trump

DATED: October 16, 2023.

/s/ Zachary Kramer
Zachary Kramer
Attorney for Proposed-Intervenor,
Donald J. Trump

PROOF OF SERVICE

David A. Kallman, hereby states and affirms that on the 16th day of October, 2023, he did serve a copy of Proposed-Intervenor’s Motion for Summary Disposition, with Brief in Support, upon Plaintiffs’ and Defendant’s counsel listed above via MiFile.

DATED: October 16, 2023.

/s/ David A. Kallman
David A. Kallman (P34200)