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CIRCUIT COURT
DANE COUNTY, WI
2022CV001178

STATE OF WISCONSIN CIRCUIT COURT DANE COUNTY
BRANCH 8

KHARY PENEBAKER, MARY ARNOLD, and BONNIE JOSEPH,

Plaintiffs,

v.

ANDREW HITT, ROBERT F. SPINDELL, JR., BILL FEEHAN, KELLY RUH, CAROL BRUNNER, EDWARD SCOTT GRABINS, KATHY KIERNAN, DARRYL CARLSON, PAM TRAVIS, MARY BUESTRIN, JAMES R. TROUPIS, KENNETH CHESEBRO, and ABC DEFENDANTS,

Defendants,

and

STATE FARM FIRE AND CASUALTY COMPANY,

Intervenor.

Case No. 22CV001178

Case Code: 30106; 30701; 30956

PLAINTIFFS' BRIEF IN OPPOSITION TO DEFENDANTS' MOTIONS TO STRIKE CERTAIN PARAGRAPHS FROM THE FIRST AMENDED COMPLAINT (DKT. 188 and 198)

TABLE OF CONTENTS

INTRODUCTION 1

BACKGROUND 1

LEGAL STANDARD 3

ARGUMENT...4

I. Defendants' motion to strike fails because the challenged allegations are related to the dispute and do not unfairly prejudice Defendants. 4

a. The introduction to the First Amended Complaint summarizes key events related to Plaintiffs' claims. 4

b. The events of January 6 were directly related to Defendants' participation in casting fake electoral votes. 5

c. Post-election events outside Wisconsin revealed the purpose and context of the fake-elector scheme. 8

d. Allegations regarding "The Future of Democracy in Wisconsin" pertain to Plaintiffs' public nuisance claim. 10

CONCLUSION...11

TABLE OF AUTHORITIES

Cases

Harleysville Lake States Ins. Co. v. Lancor Equities, Ltd.,
No. 13 C 6391, 2014 WL 627561 (N.D. Ill. Feb. 18, 2014) 4, 9

Harris v. Chipotle Mexican Grill, Inc.,
303 F.R.D. 625 (E.D. Cal. 2014) 4

Jacobsen v. Katzer,
449 F. App'x 8 (Fed. Cir. 2010) 4

Jacobsen v. Katzer,
609 F. Supp. 2d 925 935 (N.D. Cal. 2009)..4, 8

Kaufman v. McCaughtry,
No. 03-C-27-C, 2003 WL 23095690 (W.D. Wis. May 22, 2003)..3, 6

Lipsky v. Common. United Corp.,
551 F.2d 887 (2d Cir. 1976) 4

Nance v. NBCUniversal Media, LLC,
No. 16-11635, 2018 WL 1762440 (N.D. Ill. Apr. 12, 2018)...5

Redwood v. Dobson,
476 F.3d 462 (7th Cir. 2007) 3

Sands v. Whitnall Sch. Dist.,
2008 WI 89, 312 Wis. 2d 1, 754 N.W.2d 439 7

Tews v. NHI, LLC,
2010 WI 137, 330 Wis. 2d 389, 793 N.W.2d 860 ....7, 11

Tucker v. Am. Int'l Grp.,
936 F. Supp. 2d 1 (D. Conn. 2013) 4

Statutes

Wis. Stat. § 802.04...4

Wis. Stat. § 802.06...3, 4, 11

Other Authorities

Jay E. Grenig, *Wisconsin Practice Series: Civil Procedure* (4th ed. 2021).................................3

INTRODUCTION

Defendants conspired to execute powers of a public office to which they were not elected, by manufacturing and then sending to Congress fake electoral votes as part of a larger effort to overturn the results of a free and fair election. Their actions damaged Wisconsin's civil society with lasting ramifications—a public nuisance. The Complaint must therefore allege—and to prevail, Plaintiffs must eventually prove—that Defendants' actions were part of a larger series of events that both preceded and succeeded their meeting on December 14, 2020. In this case, context is key. Because the Defendants do not like how their actions appear in context, they have filed a motion to strike numerous allegations—amounting to nearly one-quarter of the total—from Plaintiffs' First Amended Complaint.[1] Because Defendants' motion does not meet the exacting legal standard for a motion to strike, it should be denied in full.

BACKGROUND

On the morning of January 6, 2021, mere hours before Congress convened to certify the electoral votes, Defendant James Troupis pleaded with Senator Ron Johnson over text message: "We need to get a document on the Wisconsin electors to you for the VP immediately." Dkt. 107 ¶153 (quoting Text Message from James Troupis to Sen. Ron Johnson (Jan. 6, 2021), available at https://justthenews.com/sites/default/files/2022-06/TroupisJohnson1.pdf). The Defendants' conspiracy to subvert the 2020 election was in full swing.

This conspiracy began no later than November 2020, when Troupis, helming the Trump campaign's legal team in Wisconsin, sought the assistance of Defendant Kenneth Chesebro. *Id.* ¶87. In response, Chesebro penned at least two memos to Troupis outlining a plan to deploy fake

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[1] Defendant Troupis filed a motion to strike, Dkt. 188, and the Elector Defendants filed a motion to strike, Dkt. 198. The latter, however, simply joined the former. For simplicity's sake, this opposition brief refers only to a pending "motion" (as opposed to "motions") to strike brought by "Defendants." Nevertheless, this brief opposes both motions.

electors *across the country* to cast fake votes for Donald Trump in the Electoral College. *Id.* ¶¶88–99; Dkt. 187, Ex. B. As Chesebro detailed the strategy, Troupis marketed the scheme to multiple Trump campaign aides, telling one: "[o]ur strategy, which we believe is replicable in all 6 contested states" is that "the second [i.e., fraudulent] slate just shows up at noon on Monday [December 14] and votes and then transmits the results." Dkt. 107 ¶¶122, 123 (quoting Maggie Haberman & Luke Broadwater, 'Kind of Wild/Creative': Emails Shed Light on Trump Fake Electors Plan, N.Y. Times (July 26, 2022), available at https://www.nytimes.com/2022/07/26/us/politics/trump-fake-electors-emails.html). He added: "[i]t is up to Pence on Jan 6 to open them." *Id.* ¶122.

The Trump Campaign took the Troupis-Chesebro plan and ran with it, appointing Chesebro to draft the documents necessary to carry out the scheme. *Id.* ¶¶103–10. And carry it out he did. "Chesebro would draft and distribute documents intended for use in the Trump team's fake elector ceremonies that were then shared with key contacts in Arizona, Georgia, Michigan, Nevada, New Mexico, Pennsylvania, and Wisconsin." *Id.* ¶116. (quoting Final Report of the Select Committee to Investigate the January 6th Attack on the United States Capitol, H.R. Rep. 117-663, at 350 (Dec. 22, 2022), available at https://www.govinfo.gov/content/pkg/GPO-J6-REPORT/pdf/GPO-J6-REPORT.pdf). "He also gave some of the groups step-by-step logistical guidance, such as when and where they should convene, how many copies each person would need to sign, and to send their fake votes to Congress via registered mail." *Id.*

In Wisconsin, Defendant Chesebro joined the Elector Defendants at the Wisconsin State Capitol on December 14, 2020. *Id.* ¶132. Before they "voted," the group learned that the Wisconsin Supreme Court had denied the Trump campaign's challenge to the results of the recount (a challenge Troupis had quarterbacked), thereby confirming Joseph Biden and Kamala Harris's

victory in Wisconsin. *Id*. ¶138. The legal challenges to Wisconsin's election results were effectively over, and those Defendants who had gathered at the Capitol knew it. *Id*. ¶¶138–139. But they voted anyway. Why? They wanted fake electoral votes to count, notwithstanding the will of Wisconsin's voters. *Id*. ¶128. So, they documented and submitted the votes as if they were valid. *Id*. ¶¶150–151. And, as described above, Defendants Troupis and Chesebro worked through January 6, 2021, to try to get these invalid electoral votes counted.

LEGAL STANDARD

Motions to strike are disfavored. There is scant Wisconsin appellate case law interpreting Wis. Stat. § 802.06(6), which says that upon a party's motion, "the court may order stricken from any pleading any insufficient defense or any redundant, immaterial, impertinent, scandalous, or indecent matter." But federal courts, whose opinions are persuasive, have little patience for such motions: "Motions to strike disserve the interest of judicial economy. The aggravation comes at an unacceptable cost in judicial time." *Redwood v. Dobson*, 476 F.3d 462, 471 (7th Cir. 2007).[2] "Because striking a portion of a pleading is a drastic remedy and because it often is sought by the movant simply as a dilatory tactic, motions under Wis. Stat. § 802.06(6) should be viewed with disfavor." 3 Jay E. Grenig, *Wisconsin Practice Series: Civil Procedure* § 206.18 (4th ed. 2021). "The pleading challenged should be liberally construed with a view to achieving substantial justice." *Id.* To succeed, the moving party must demonstrate that the "challenged allegations are so unrelated to plaintiff's claim as to be devoid of merit, unworthy of consideration, and unduly prejudicial." *Kaufman v. McCaughtry*, No. 03-C-27-C, 2003 WL 23095690, at *1 (W.D. Wis. May 22, 2003). "[B]ackground information and . . . context for the other allegations in the amended complaint," even when outside the relevant time period, are not appropriate targets for

[2] See also the cases cited in Defendant Troupis's brief and quoted in note 3.

a motion to strike. *Harleysville Lake States Ins. Co. v. Lancor Equities, Ltd.*, No. 13 C 6391, 2014 WL 627561, at *3 (N.D. Ill. Feb. 18, 2014).[3]

ARGUMENT

I. Defendants' motion to strike fails because the challenged allegations are related to the dispute and do not unfairly prejudice Defendants.

Defendants move to strike large swaths of the First Amended Complaint. Dkt. 188. But they do not apply a standard for a motion to strike to any specific allegation. Instead, they group dozens of allegations into broad categories, mischaracterizing them along the way. Because Defendants fail to meet the exacting burden on a motion to strike, their motion should be denied.

a. The introduction to the First Amended Complaint summarizes key events related to Plaintiffs' claims.

In moving this Court to strike the introduction of the First Amended Complaint, Defendants conflate Wis. Stat. § 802.04(2) with Wis. Stat. § 802.06(6). Mild departure from the form-of-pleadings statute (Wis. Stat. § 802.04(2)) is not contemplated as a ground to strike under Wis. Stat. § 802.06(6). The absence of a numeral does not render an allegation *per se* "redundant, immaterial, impertinent, scandalous, or indecent."

Here, the introduction provides a helpful roadmap to understand the scope and reach of Defendants' conduct. This is easily distinguishable from the only authority Defendants cite on

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[3] Defendants cobble together a standard by selectively quoting from eight different opinions issued by seven separate federal district courts—none of which is precedent in this Court, and most of which are not from courts within this state. Dkt. 189, 3–4. From this broad assortment, Defendants cherry picked their citations. For example, they fail to mention that half of their cases include language explaining that motions to strike are viewed with disfavor and rarely granted: *Lipsky v. Commonwealth United Corp.*, 551 F.2d 887, 893 (2d Cir. 1976) ("[T]he courts should not tamper with the pleadings unless there is a strong reason for so doing."); *Jacobsen v. Katzer*, 609 F. Supp. 2d 925, 935 (N.D. Cal. 2009), *dismissed*, 449 F. App'x 8 (Fed. Cir. 2010) ("Motions to strike are regarded with disfavor because they are often used as delaying tactics and because of the limited importance of pleadings in federal practice."); *Harris v. Chipotle Mexican Grill, Inc.*, 303 F.R.D. 625, 628 (E.D. Cal. 2014) ("Because motions to strike are often used as delaying tactics, they are generally disfavored and are rarely granted in the absence of prejudice to the moving party." (internal quotation marks and citations omitted)); *Tucker v. Am. Int'l Grp.*, 936 F. Supp. 2d 1, 15 (D. Conn. 2013) ("In general, these motions to strike are viewed unfavorably and rarely granted." (internal quotation marks, citations, and alterations omitted)).

the subject, *Nance v. NBCUniversal Media, LLC*, No. 16-11635, 2018 WL 1762440 (N.D. Ill. Apr. 12, 2018). In *Nance*, the plaintiff admitted to threatening his coworkers and was terminated. *Id*. at *1. Afterwards, he sued his employer, claiming that a series of pre-termination workplace grievances gave rise to "a bevy of sex, race, and age-based discrimination claims." *Id.* In a multi-page introduction, Nance offered "a recitation of recent and notorious sexual harassment allegations wholly unrelated to this case (mentions include actor Kevin Spacey, comedian Louis C.K., and former Senate candidate Roy Moore)," which the court characterized as "immaterial to Plaintiff's claims." *Id.* at *7. The court struck Nance's introduction because it was "immaterial" and bore only "the most tenuous of relationships to Plaintiff's claims." *Id.* By contrast, the introduction to Plaintiffs' First Amended Complaint pertains entirely to the circumstances surrounding the fake elector scheme, which culminated in the events of January 6, 2021.

b. The events of January 6 were directly related to Defendants' participation in casting fake electoral votes.

Defendants argue that ¶¶160–185 of the First Amended Complaint, a section titled "The Aftermath of Defendants' Actions," should be stricken because those allegations "discuss events which occurred at the U.S. Capitol on January 6, 2021," and "[t]here is no allegation in this section regarding any action by any of the Defendants." Dkt. 189 at 6. This is untrue. Paragraphs 163 n.72, 166, and 167 explicitly recount actions taken by Defendants Chesebro and Feehan. More generally, it is simply wrong to suggest that this section of the First Amended Complaint is unrelated to this case, or that the allegations in the First Amended Complaint are detached from the events of January 6, 2021. To the contrary, the Complaint (in general) and the contested section of it (in specific) detail how Defendants' actions in Wisconsin were an essential predicate to the larger national scheme, and how some Defendants advanced this national scheme up to, and

(in the case of Defendant Troupis) including, January 6, 2021. Defendants' arguments on this point are overly general, and do not address particular paragraphs.

A closer look at the challenged paragraphs, in context with the rest of the Complaint, reveals how far short Defendants' motion to strike falls:

- Defendant Chesebro's November 18, 2020, memo to Defendant Troupis identified January 6, 2021, as the date on which the President of the Senate (the Vice President) would open Electoral College votes. Dkt. 107 ¶90. For Defendants to carry out their scheme on January 6, they needed fraudulent electoral college votes to be on hand for Vice President Pence to open. *Id.* ¶¶122, 160.
- Paragraphs 160–168 describe the Trump team's efforts to obtain legitimacy for the fake votes cast in various states, including Wisconsin. This pressure campaign included frivolous filings from allied individuals, including Defendant Feehan. *Id.* ¶163 & n.72.
- Paragraph 167 alleges that Defendant Chesebro participated in the pressure campaign to have the fake votes counted.
- Paragraphs 168–172 describe how the fake-elector strategy won allies in the United States Congress.
- Paragraphs 173–174 allege that the 2020 presidential election in Wisconsin and the United States more broadly was safe and secure—a relevant underlying fact for the allegation that Defendants' efforts to undermine it were baseless and unlawful.
- Paragraphs 175–185 partially describe the events of January 6, emphasizing the centrality of the fake electoral votes to the events of that day.[4]

The standard to strike (no matter how articulated) is not met here. It cannot be fairly represented that this portion of the Complaint carries "no possible relation to the controversy," Dkt. 189 at 4, or that it is "devoid of merit, unworthy of consideration, and unduly prejudicial." *Kaufman*, 2003 WL 23095690, at *1 (internal quotation marks and citation omitted). This section specifically refers to actions by Defendants Chesebro and Feehan and further details how the other

[4] Cutting all references to January 6, 2021, would place Defendants' actions in an artificial vacuum. Defendants complain of "the sheer length and exaggeration of [Plaintiffs'] January 6th-related prose," Dkt. 189 at 6, but in fact, the Complaint directly addresses January 6 in about two pages of introductory text, and then in 11 additional paragraphs (less than two pages) that maintain a tight focus on the role of the fake electoral votes in bringing about the events of that day.

Defendants' efforts to cast fake electoral votes are inexorably intertwined with the events of January 6, 2021. These allegations bear directly on this case.

Defendants' accusation of "prejudice" and overwhelming trial scope are similarly unavailing. Undoubtedly these allegations are prejudicial to Defendants: they demonstrate how their conduct eroded our democratic institutions and nearly undermined a presidential election. But Defendants have failed to identify any way in which this prejudice is somehow unfair or undue. They have never suggested, for example, that it would be impossible or difficult to meet these allegations in an answer. Nor have they suggested that these allegations put them at any specific procedural disadvantage. This is unsurprising because the relevance of the complaint fades after the initial pleadings stage, largely "because the complaint is not evidentiary." *Tews v. NHI, LLC*, 2010 WI 137, ¶82, 330 Wis. 2d 389, 793 N.W.2d 860 (quoted source omitted). So, its language is unlikely to unfairly (or otherwise) prejudice Defendants when the case proceeds to summary judgment and/or trial. In any event, Defendants have failed to even identify how it *could* unfairly prejudice them.

Defendants' hypothetical complaints about the scope of trial are at best a red herring: these concerns will be resolved at summary judgment or through motions *in limine*. And they certainly should not be resolved unless and until Plaintiffs have had a fair opportunity to undertake the broad discovery Wisconsin law envisions. *See, e.g.*, *Sands v. Whitnall Sch. Dist.*, 2008 WI 89, ¶¶19–20, 312 Wis. 2d 1, 754 N.W.2d 439 ("The parameters of permissible discovery are broad by necessity. . . . One of the fundamental policies of our law . . . is that the judicial system and rules of procedure should provide litigants with full access to all reasonable means of determining the truth. The quest for truth in each case, in turn, demands that we allow litigants to build complete records, investigating and preparing their cases thoroughly before presenting their cases to fact-finders." (internal quotation marks and citations omitted)); *accord Jacobsen*, 609 F.

Supp. 2d at 935 ("[B]y virtue of discovery, [plaintiff] may find additional [supporting information] and therefore, Defendants' motion to strike is premature.").

c. Post-election events outside Wisconsin revealed the purpose and context of the fake-elector scheme.

Defendants request that this Court strike "events that occurred elsewhere in the United States regarding the election, including actions by Trump and campaign/administration officials, and efforts in other states to question the outcome of the election." Dkt. 189 at 7. But these allegations pertain to Plaintiffs' civil conspiracy claim, giving crucial context to Defendants' actions on and around December 14, 2020. It is relevant that Defendant Troupis, on January 6, tried to funnel documents executed by Wisconsin's fake electors to the Vice President, who was preparing to preside over the congressional count of electoral votes. Dkt. 107 ¶153. Actions taken by Defendants outside of Wisconsin served to set the stage for Wisconsin's fake votes to be counted and are likewise relevant. As Defendants admit, the Complaint alleges "that Defendant Chesebro was involved in activities in other states." Dkt. 189 at 7. Because Defendants Troupis and Chesebro acted both in Wisconsin *and elsewhere*, events outside of Wisconsin bear an obvious and definite relationship to their conduct here. It is also relevant that, even as these activities in furtherance of the false elector scheme were occurring elsewhere, all of which was exhaustively covered in the national media, Defendants did nothing to disclaim or correct the fraudulent votes they submitted. Thus, Defendants' preferred, exacting standard for what should be stricken—allegations bearing "no possible relation" Dkt. 189 at 4. to the claims asserted—is simply not met.

Notably, Defendants have not identified all the paragraphs they believe fall into this category, noting only that the category "includes paragraphs 84–85, 125 and 128." Dkt. 189 at 7. Paragraphs 84–85 describe early communications among Trump allies endorsing the premise of

the later-crystallized Chesebro-Troupis fake-elector strategy. Defendants claim that these paragraphs are "prejudicial" because they "paint [the Defendants] as aligned with highly unpopular and oft-criticized actions." *Id.* at 8. But these paragraphs pertain to other Trump campaign aides (Donald Trump Jr. and former Energy Secretary Rick Perry), with whom Defendants *were* specifically aligned in supporting the Trump campaign. Defendant Troupis, for example, served as a lawyer for the campaign, Dkt. 107 ¶14, and (in line with Perry and Trump Jr.'s texts) tried to implement the false-elector strategy to illegally seat Donald Trump for a second term—a second term which the voters had denied him. Similarly, Defendant Hitt was the Chairman of the Republican Party of Wisconsin during the relevant time period. *Id.* ¶ 4. Thus, these paragraphs (84-85) are not apt targets for a motion to strike because they "provide background information and a context for the other allegations in the amended complaint." *Harleysville*, 2014 WL 627561, *3. This principle holds true even when the challenged allegations precede the relevant time period. *Id*.

Paragraph 125 quotes Defendant Troupis's Arizona counterpart, Jack Wilenchik, describing Defendant Chesebro's plan to encourage Republicans to send in fake electoral votes, even though, in Wilenchik's words, "the votes aren't legal under federal law." This contemporaneous rejection of Chesebro's scheme is noteworthy and relevant. It either demonstrates Wilenchik's recollection of a conversation with Chesebro in which Chesebro admitted "the votes aren't legal," or it shows Chesebro knew or should have known that what he was encouraging was illegal. Either way, this allegation reflects directly upon the controversy at hand.

Paragraph 128 relates even more obviously to the dispute at the center of this lawsuit. It alleges that Defendants Troupis and Chesebro executed their fake-elector scheme in Wisconsin and elsewhere because they wanted the fake votes to count, even though they knew the individuals casting the votes were not lawfully elected presidential electors. As with paragraphs 84, 85,

and 125, Defendants offer no focused argument against the allegation but instead only broadside attacks based on vague accusations about a "roving commission in search of political dirt." Dkt. 189 at 7. Defendants do not explain why this paragraph in particular has "no possible relation to the controversy." The analysis is simple and resolves in Plaintiffs' favor. This paragraph alleges something central to this dispute: that Defendants knew what they were doing was illegal and pressed forward anyway. Because bombast alone will not replace the legal standard on a motion to strike, this Court should deny Defendants' motion here as well.

d. Allegations regarding "The Future of Democracy in Wisconsin" pertain to Plaintiffs' public nuisance claim.

In arguing that this section (Dkt. 107 ¶¶186–229) should be stricken in full, Defendants once again neglect to apply the relevant standard to any specific paragraphs. Instead, they deploy innuendo and bluster in an attempt to divorce their actions from their foreseeable consequences.

True, "everything is not connected to everything else." Dkt. 189 at 9. But some things are. People are responsible for the foreseeable consequences of their conduct—including that when Defendants and their allies engaged in a concerted effort to publicly, repeatedly, and insistently cast doubt on the outcome of the presidential election, others would follow their lead and continue to bang the metaphorical drum.

This case is about more than a simple meeting on December 14, 2020. As the final paragraphs of the operative complaint make clear, our shared democracy—a tradition nearly 250 years in the making—was harmed by a months-long campaign to 1) seat invalid electors to the Electoral College and 2) pressure the Vice President to count fake electoral college votes on January 6, 2021, so that 3) Donald Trump would remain President contrary to the results of a free and fair election. This final section details that this effort did not take place in a vacuum, and that Plaintiffs, like Wisconsin as a whole, must now reckon with the results.

Defendants' motion to strike fails here for the same reasons it fails elsewhere: they cannot meet the actual legal standard. These allegations are not "redundant, immaterial, impertinent, scandalous, or indecent" such that they can be stricken under Wis. Stat. § 802.06(6). They bear an obvious relation to Plaintiffs' claims and are not completely disconnected from this case. *See Nance*, 2018 WL 1762440, at *7. Defendants' suggestion that the final paragraphs are "aimed at influencing a factfinder," Dkt. 189 at 10, is misplaced, because the Complaint itself cannot be introduced as evidence. *Tews*, 2010 WI 137, ¶82. Defendants' motion should be denied.

CONCLUSION

As Courts have cautioned, motions to strike are often exercises in unnecessary delay. This is no exception. Defendants failed to apply the correct standard, or even their own standard, to the paragraphs they seek to strike. And they have failed to articulate a coherent explanation of how any disputed paragraph has "no *possible* relation" to the larger dispute, or how the inclusion of any such paragraph unfairly prejudices any of them. For these reasons and for those articulated above, Plaintiffs respectfully request that Defendants' Motion to Strike be DENIED.

Dated June 21, 2023

Electronically signed by Jeffrey A. Mandell

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