

STATE OF MINNESOTA
IN SUPREME COURT
No. A23-1354

FILED

October 18, 2023

OFFICE OF
APPELLATE COURTS

Joan Growe, Paul Anderson, Thomas
Beer, David Fisher, Vernae Hasbargen,
David Thul, Thomas Welna, and Ellen
Young,

**PETITIONERS' MOTION FOR LEAVE
TO FILE ENLARGED BRIEF**

Petitioners,

v.

Steve Simon, Minnesota Secretary of
State,

Respondent,

v.

Republican Party of Minnesota,

Intervenor-Respondent.

Pursuant to Rule 132 of the Minnesota Rules of Appellate Procedure, Petitioners respectfully request that this Court grant leave to file a reply brief of up to 11,000 words in the above-captioned matter. Petitioners have good cause for this request because they will be responding to briefs filed by Respondent Secretary of State Steve Simon, Intervenor-Respondent Republic Party of Minnesota, and amicus curiae Donald J. Trump for President 2024, Inc. each of which may be up to 14,000 words in length. Petitioners also may need to respond to issues raised in two additional amicus briefs to be filed on Friday, October 20, 2023. Petitioners make this request now, prior to receiving the briefs to which they must respond, in light of the expedited five-day period for submitting their reply brief in order to ensure that they have a sufficient opportunity to respond to the arguments which may be made.

Respondent Secretary of State Steve Simon has stated that he has no objection to this request. Intervenor-Respondent Republican Party of Minnesota has stated that it “cannot consent” to the request to extend the word limit.

For the above good cause, Petitioners respectfully request that they be permitted to submit a reply brief containing 11,000 words.

Dated: October 18, 2023

Respectfully submitted,

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

s/David J. Zoll

Charles N. Nauen (#121216)

David J. Zoll (#0330681)

Kristen G. Marttila (#0346007)

Rachel A. Kitze Collins (#0396555)

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

100 Washington Avenue South, Suite 2200

Minneapolis, MN 55401-2159

(612) 339-6900

cnnauen@locklaw.com

djzoll@locklaw.com

kgmarttila@locklaw.com

rakitzeollins@locklaw.com

FREE SPEECH FOR PEOPLE

Ronald Fein (*pro hac vice*)

Amira Mattar (*pro hac vice*)

Courtney Hostetler (*pro hac vice*)

John Bonifaz (*pro hac vice*)

Ben Clements (*pro hac vice*)

1320 Centre St. #405

Newton, MA 02459

(617) 244-0234

rfein@freespeechforpeople.org

amattar@freespeechforpeople.org

chostetlet@freespeechforpeople.org

jbonifaz@freespeechforpeople.org

bclements@freespeechforpeople.org

Attorneys for Petitioners

CERTIFICATION OF BRIEF LENGTH

I hereby certify that this petition conforms to the requirements of Minn. R. Civ. App. P. 132.02, for a response produced with a proportional 13-point font. The length of this brief is **204** words. This brief was prepared using Microsoft Word 2016.

s/David J. Zoll

David J. Zoll, #330681