

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. 1:22-cv-477

**PARABLE, RON HANKS, LAUREL IMER, DAVE PETERS, CHARLES W. “CASPER”
STOCKHAM, JOANN WINDHOLZ,**

Plaintiffs,

v.

JENA GRISWOLD, in her official capacity as Colorado Secretary of State,

Defendant.

MOTION FOR LEAVE TO FILE *AMICUS CURIAE* BRIEF IN SUPPORT OF PLAINTIFFS

The Public Interest Legal Foundation (“Foundation”) respectfully requests leave to file an *amicus curiae* brief. The Foundation’s proposed brief is attached as Exhibit A. The Foundation sought the parties’ positions on this Motion. Defendant does not oppose the motion for leave to submit an *amicus* brief provided that Plaintiffs consent to affording Defendant an opportunity to respond to the *amicus* brief. Plaintiffs have no objection, either to the *amicus* brief or to affording Defendant an opportunity to respond, as long as the time for response does not delay the timetable for the hearing currently set for April 5.

The Foundation is a non-partisan, 501(c)(3) public-interest organization that is dedicated entirely to promoting the integrity of elections nationwide through research, education, remedial programs, and litigation. The Foundation’s mission includes preserving the constitutional balance

between states and the federal government regarding election administration procedures. The Foundation has a strong interest in the constitutional questions presented by this case.

/s/ Kaylan Phillips
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CERTIFICATE OF SERVICE

I certify that on March 22, 2022, this document was filed with the Clerk of the Court, using the CM/ECF system, causing it to be served on all counsel of record.

Dated: March 22, 2022

Respectfully submitted,

/s/ Kaylan Phillips
Kaylan Phillips