

**STATE OF MICHIGAN
IN THE COURT OF CLAIMS**

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

Plaintiffs,

Case No: 23-000137-MZ

Hon. James Robert Redford

v.

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

Defendant.

NICKELHOFF & WIDICK, PLLC

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**CONSTITUTIONAL ACCOUNTABILITY
CENTER**

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*Attorneys for Proposed Amicus Curiae
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**MOTION OF PROPOSED AMICUS CURIAE TO FILE BRIEF OF CONSTITUTIONAL
ACCOUNTABILITY CENTER IN SUPPORT OF PLAINTIFFS**

The Constitutional Accountability Center (“CAC”) respectfully moves this Court for leave to file the attached *amicus curiae* brief. In support of this motion, CAC states as follows:

1. CAC is a think tank and public interest law firm dedicated to fulfilling the progressive promise of the Constitution’s text and history. CAC has a strong interest in ensuring that constitutional provisions are understood in accordance with their text and history and accordingly has an interest in this case.
2. In furtherance of this goal, CAC has studied the text and history of Section 3 of the Fourteenth Amendment, and the proposed brief will explain why constitutional text and history make clear that Section 3 applies to both presidents and the presidency.
3. Counsel for Plaintiffs has consented to this motion. Counsel for the Secretary takes no position. Counsel for Proposed Intervenor opposes the motion.

WHEREFORE, CAC respectfully requests that the Court grant this motion.

Respectfully submitted,

NICKELHOFF & WIDICK, PLLC

/s/ Andrew Nickelhoff

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Dated: October 23, 2023