

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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Minnesota Chamber of Commerce, a  
Minnesota nonprofit corporation,

CASE 0:23-cv-02015-ECT-JFD

Plaintiff,

vs.

John Choi, in his official capacity as  
County Attorney for Ramsey County,  
Minnesota, et al.

Defendants.

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**MOTION OF MINNESOTA  
BROADCASTERS  
ASSOCIATION AND  
MINNESOTA NEWSPAPER  
ASSOCIATION FOR LEAVE TO  
FILE BRIEF AS AMICI CURIAE**

Pursuant to the Court's Order in this matter dated November 3, 2023, the Minnesota Broadcasters Association and the Minnesota Newspaper Association request leave to jointly file a brief amici curiae in the above-captioned case.

MBA and MNA are voluntary trade associations organized as a nonprofit corporation that promote the interests of Minnesota's broadcasters and newspapers respectively. Collectively, MBA and MNA through their members represent a large percentage of Minnesota's professional news organizations and journalists.

As with plaintiff Chamber of Commerce and its members, amici and their members desire to engage in political expression, and they are themselves entities whose speech may be restricted by Minn. Stat. §211B.15. In addition, they desire to carry the paid political advertising of various business entities and organizations that wish to disseminate such

advertising by means of broadcast outlets, newspapers, and the websites they maintain.

However, amici and their members will likely be deterred from doing so by the statute.

MBA and MNA support the position of plaintiff Minnesota Chamber of Commerce. They believe a brief amici curiae is desirable because the impact of the decision rendered by the Court may extend well beyond the immediate parties to the action. Applicants would file a single, joint brief if their motion is granted.

DATED: November 20, 2023

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