

**IN THE SUPREME COURT FOR THE STATE OF OREGON**

MARY LEE NELSON,  
MICHAEL NELSON, JUDY HUFF,  
SAMUEL JOHNSON, and  
CHAD SULLIVAN, electors of Oregon,

Plaintiffs-Relators,

v.

LAVONNE GRIFFIN-VALADE,  
Secretary of State of Oregon,

Defendant.

SC S070658

**MANDAMUS  
PROCEEDING:**

**MOTION FOR LEAVE TO  
FILE MEMORANDUM OF  
ADDITIONAL  
AUTHORITIES BY  
PLAINTIFFS-RELATORS**

Plaintiffs-Relators move to file as additional authority the full opinion of the Colorado Supreme Court in *Anderson v. Griswold*, No. 23SA300 (December 19, 2023), including dissents. The opinion directly addresses many of the issues presented by Plaintiffs-Relators in this case.

Undersigned counsel sought the positions of Defendant and Amici by email on December 19, 2023. The position of Defendant on this motion is: no objection. Counsel for Amici have not responded.

Dated: December 20, 2023

Respectfully Submitted,

/s/ Daniel Meek

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Ronald Fein (pro hac vice pending)  
John Bonifaz (pro hac vice pending)  
Ben Clements (pro hac vice pending)

Of Attorneys for Plaintiffs-Relators

**CERTIFICATE OF FILING AND SERVICE**

I certify that on December 20, 2023, I filed by Efile to the Appellate Court Administrator the foregoing:

**MANDAMUS PROCEEDING: MOTION TO FILE  
MEMORANDUM OF ADDITIONAL AUTHORITIES BY  
PLAINTIFFS-RELATORS**

I certify that on December 20, 2023, I served that document on the party representatives listed below by Efile and by conventional email.

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Dated: December 20, 2023

*/s/ Daniel W. Meek*

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Daniel W. Meek