

IN THE OREGON SUPREME COURT OF THE STATE OF OREGON
STATE EX REL 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.

S070658

**MANDAMUS PROCEEDING: MOTION FOR LEAVE TO FILE
REPLY BRIEF BY PLAINTIFFS-RELATORS**

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Plaintiffs-Relators move for leave to file a brief in reply to the responses of the Secretary of State and the Intervenor-Defendants Donald Trump and the Trump Campaign.

The proposed reply is warranted to respond to issues raised by the Secretary's Response that are not encompassed by the Court's January 2, 2024, order for supplemental briefing and to meritless arguments, raised in Intervenor-Defendants' Response, that have now been fully considered and rejected by the Colorado Supreme Court in *Anderson v. Griswold*, 2023 CO 63, ___ P3d ___, 2023 WL 8006216 (Colo Dec. 19, 2023), *cert granted sub nom. Trump v. Anderson*, No. 23-719, 2024 WL 61814 (2024), a decision that was not available to Relators when they submitted their Petition. The brief is filed with this motion.

Undersigned counsel sought the positions of Defendant and Intervenor-Defendants by email on December 29, 2023. Defendant's position is: no objection. Counsel for Intervenor-Defendants have not responded.

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This reply brief will assist the Court in resolving the issues presented.

January 8, 2024

Respectfully Submitted,

/s/ Daniel Meek

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CERTIFICATE OF FILING AND SERVICE

I certify that on this day I filed by Efile to the Appellate Court Administrator the foregoing:

MANDAMUS PROCEEDING: MOTION FOR LEAVE TO FILE REPLY BRIEF BY PLAINTIFFS-RELATORS

I certify that on this day I served that document on the party representatives listed below by Efile and by conventional email:

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Dated: January 8, 2024

/s/ Daniel W. Meek

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