

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

LISA HUNTER, JACOB ZABEL, JENNIFER OH, JOHN PERSA,
GERALDINE SCHERTZ, and KATHLEEN QUALHEIM,

Plaintiffs,

and

BILLIE JOHNSON, ERIC O'KEEFE, ED PERKINS, and
RONALD ZAHN,

Intervenor-Plaintiffs,

v.

MARGE BOSTELMANN, JULIE M. GLANCEY, ANN S.
JACOBS, DEAN KNUDSON, ROBERT F. SPINDELL, JR., and
MARK L. THOMSEN, in their official capacities as members of the
Wisconsin Elections Commission,

Defendants,

and

WISCONSIN LEGISLATURE,

Intervenor-Defendant,

and

GOVERNOR TONY EVERS,

Intervenor-Defendant,

and

CONGRESSMEN GLENN GROTHMAN,
MIKE GALLAGHER, BRYEN STEIL, TOM TIFFANY,
and SCOTT FITZGERALD,

Intervenor-Defendants.

21-cv-512-jdp-ajs-eec

Three-Judge Court

BLACK LEADERS ORGANIZING FOR
COMMUNITIES, VOCES DE LA FRONTERA,
the LEAGUE OF WOMEN VOTERS OF
WISCONSIN, CINDY FALLONA, LAUREN
STEPHENSON, and REBECCA ALWIN,

Plaintiffs,

v.

MARGE BOSTELMANN, JULIE M. GLANCEY, ANN S.
JACOBS, DEAN KNUDSON, ROBERT F. SPINDELL, JR., and
MARK L. THOMSEN, in their official capacities as members of the
Wisconsin Elections Commission, and MEAGAN WOLFE, in her
official capacity as the administrator of the Wisconsin Elections
Commission,

Defendants.

21-cv-534-jdp-ajs-eec

Three-Judge Court

**MOTION TO INTERVENE BY THE PROPOSED PLAINTIFF-INTERVENORS
CITIZEN DATA SCIENTISTS**

Stephen Joseph Wright, Jean-Luc Thiffeault, Somesh Jha, Joanne Kane, Michael Switzenbaum, and Leah Dudley, (together, “Proposed Plaintiff-Intervenors” or “Citizen Data Scientists”), through their counsel, hereby move to intervene in the above-captioned cases pursuant to Federal Rule of Civil Procedure 24. The Proposed Plaintiff-Intervenors’ bases for intervention are stated in an accompanying memorandum. The Proposed Plaintiff-Intervenors also attach a proposed complaint. None of the original parties in this consolidated action oppose intervention by the Citizen Data Scientists.¹

Dated: September 20, 2021

Respectfully submitted,

/s/ Sarah A. Zylstra

Michael P. May (State Bar No. 1011610)

Sarah A. Zylstra (State Bar No. 1033159)

Tanner G. Jean Louis (State Bar No. 1122401)

Boardman Clark LLP

1 South Pinckney St.

Suite 410

Madison, WI 53701

(608) 286-7161

(608) 283-1741

mmay@boardmanclark.com

szylstra@boardmanclark.com

David J. Bradford (*pro hac vice application
forthcoming*)

Jenner & Block LLP

353 N. Clark St.

Chicago, IL 60654

(312) 923-2975

dbradford@jenner.com

¹ Plaintiffs Black Leaders Organizing for Communities, Voces de la Frontera, the League of Women Voters of Wisconsin, Cindy Fallona, Lauren Stephenson, and Rebecca Alwin (together, the “BLOC Plaintiffs”) have indicated through counsel that they consent to the motion. Plaintiffs Lisa Hunter, Jacob Zabel, Jennifer Oh, John Persa, Geraldine Schertz, and Kathleen Quahleim (together, the “Hunter Plaintiffs”) have indicated through counsel that they do not oppose the motion. Defendants Robert Spindell Jr., Mark Thomsen, Dean Knudson, Ann Jacobs, Julie Glancey, Marge Bostelmann, and Meagan Wolfe (together, the “Original Defendants”) have indicated through counsel that they take no position on the motion.