

**In the Supreme Court of the United States**

---

BEVERLY CLARNO, Oregon Secretary of State,

*Applicant,*

v.

PEOPLE NOT POLITICIANS OREGON, COMMON CAUSE, LEAGUE OF WOMEN  
VOTERS OF OREGON, NAACP OF EUGENE/SPRINGFIELD, INDEPENDENT  
PARTY OF OREGON, and C. NORMAN TURRILL,

*Respondents.*

---

**SUPPLEMENTAL BRIEF**

---

STEPHEN ELZINGA  
SHERMAN, SHERMAN,  
JOHNNIE & HOYT, LLP  
693 Chemeketa Street NE  
Salem, OR 97301

KATHAY FENG  
DAN VICUNA  
COMMON CAUSE  
453 S. Spring Street, Suite 401  
Los Angeles, CA 90013

R. ADAM LAURIDSEN  
JAY RAPAPORT  
*Counsel of Record*  
DAVID J. ROSEN  
TARA M. RANGCHI  
KEKER, VAN NEST &  
PETERS LLP  
633 Battery Street  
San Francisco, CA 94111  
(415) 391-5400  
jrapaport@keker.com

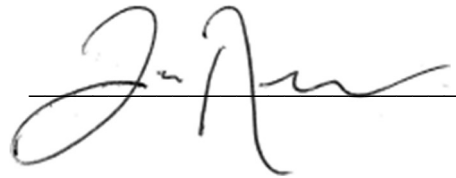
*Counsel for Respondents*

The Attorney General confirms Secretary Clarno did not seek this appeal. Instead, the Secretary “defer[s]” to the Attorney General. That is not “consent” to appeal. The Secretary must make that decision. Restatement (Third) of the Law Governing Lawyers § 22 (2000).

Because the Secretary does not want to proceed, the Attorney General pursues this appeal for her own interests, tacitly trying to intervene. Stay App. at 2 n.1. But the Attorney General cannot change “hats” on appeal to create standing. *Virginia House of Delegates v. Bethune-Hill*, 139 S. Ct. 1945, 1953 (2019). Intervention requires a live dispute. There is none.

August 10, 2020

Respectfully submitted,



STEPHEN ELZINGA  
SHERMAN, SHERMAN,  
JOHNNIE & HOYT, LLP  
693 Chemeketa Street NE  
Salem, OR 97301

R. ADAM LAURIDSEN  
JAY RAPAPORT  
*Counsel of Record*  
DAVID J. ROSEN  
TARA M. RANGCHI  
KEKER, VAN NEST &  
PETERS LLP  
633 Battery Street  
San Francisco, CA 94111  
(415) 391-5400  
jrapaport@keker.com

KATHAY FENG  
DAN VICUNA  
COMMON CAUSE  
453 S. Spring Street, Suite 401  
Los Angeles, CA 90013

*Counsel for Respondents*