

**STATE OF MICHIGAN  
IN THE SUPREME COURT**

*In re* HOUSE OF REPRESENTATIVES  
REQUEST FOR ADVISORY OPINION  
REGARDING CONSTITUTIONALITY OF  
2018 PA 368 & 369

No. 159160

*In re* SENATE REQUEST  
FOR ADVISORY OPINION REGARDING  
CONSTITUTIONALITY OF  
2018 PA 368 & 369

No. 159201

**MOTION BY THE AMERICAN CIVIL LIBERTIES UNION OF MICHIGAN,  
THE LEAGUE OF WOMEN VOTERS OF MICHIGAN, AND  
AMERICAN ASSOCIATION OF UNIVERSITY WOMEN OF MICHIGAN  
FOR LEAVE TO FILE AMICUS CURIAE BRIEF**

By this motion, and pursuant to MCR 7.308(B)(2), the American Civil Liberties Union of Michigan (“ACLU”), the League of Women Voters of Michigan (“LWV”), and the American Association of University Women of Michigan (“AAUW”) seek leave to file an amicus curiae brief in the above-captioned cases. In support of this motion, the proposed amici state as follows:

1. The American Civil Liberties Union of Michigan (“ACLU”) is the Michigan affiliate of a nationwide, nonpartisan organization with over a million members dedicated to protecting the rights guaranteed by the United States Constitution. The ACLU has long been committed to protecting the right to vote, the freedom to petition, ballot access, and other rights vital to a healthy and robust democracy. The ACLU provides direct representation and files amicus curiae briefs in cases involving civil rights that impact the democratic process, including voting rights, ballot access and the right to petition. See, e.g., *Citizens Protecting Michigan’s Constitution v Sec’y of State*, 503 Mich 42; 921 NW2d 247 (2018); *Stand Up for Democracy v Sec’y of State*,

492 Mich 588; 822 NW2d 159 (2012); *Socialist Workers Party v Sec'y of State*, 412 Mich 571; 317 NW2d 1 (1982); *Moore v Johnson*, 2014 WL 4924409, unpublished opinion of the United States District Court for the Eastern District of Michigan, entered May 23, 2013 (Docket No. 14-11903). The ACLU of Michigan was also actively engaged in a citizen-initiated constitutional amendment in 2018, Proposal 3 – Promote the Vote.

2. The League of Women Voters of Michigan (“League of Women Voters”) is the Michigan affiliate of a nationwide, nonpartisan organization. The League of Women Voters is committed to diversity and pluralism, recognizes that diverse perspectives are important and necessary for responsible and representative decision making, and subscribes to the belief that diversity and pluralism are fundamental to the values it upholds. The League of Women Voters has been a party in numerous cases to protect the civil rights of Michigan citizens. The League of Women Voters was also actively engaged in a citizen-initiated constitutional amendment in 2018, Proposal 3 – Promote the Vote.

3. The American Association of University Women of Michigan (“AAUW”) is the Michigan chapter of a national, nonpartisan organization promoting equity and education for women and girls. The AAUW’s goal is to advance gender equity for women and girls through research, education and advocacy. Raising the minimum wage and adoption of earned paid sick leave for employees are among the national priorities of the organization. The AAUW’s members actively engaged in collection of signatures for both citizen initiatives.

4. The proposed amici believe that, given their expertise and history of advocacy around issues involving constitutional law, voting rights, and democracy, their amicus curiae brief will be of assistance to the Court.

5. The movants’ proposed amicus curiae brief accompanies this motion.

For these reasons, the proposed amici request that this Court grant them leave to file an amicus curiae brief, and accept the attached brief as filed.

Respectfully submitted,

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Dated: June 19, 2019