

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

ANTHONY DAUNT, et al.,

Plaintiffs,

Case No. 1:19-cv-614 (Lead)

v.

JOCELYN BENSON, in her official capacity as  
Michigan Secretary of State,

Defendant,

and

COUNT MI VOTE d/b/a VOTERS NOT  
POLITICIANS,

Intervenor-Defendant.

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MICHIGAN REPUBLICAN PARTY, et al.,

Plaintiffs,

Case No. 1:19-cv-669  
(Member)

v.

JOCELYN BENSON, in her official capacity as  
Michigan Secretary of State,

Defendant,

HON. JANET T. NEFF

and

COUNT MI VOTE d/b/a VOTERS NOT  
POLITICIANS,

Intervenor-Defendant.

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**INTERVENOR-DEFENDANT VOTERS NOT POLITICIANS'  
ANSWER IN OPPOSITION TO MOTION FOR PRELIMINARY INJUNCTION  
(DOCKET NO. 1:19-cv-614)**

**ORAL ARGUMENT REQUESTED**

NOW COMES Intervenor-Defendant Count MI Vote, d/b/a Voters Not Politicians (“Voters Not Politicians”), a Michigan non-profit corporation, by and through its attorneys, Fraser Trebilcock Davis & Dunlap, P.C. and the Campaign Legal Center, answering Plaintiffs’ Motion for Preliminary Injunction in *Anthony Daunt, et al. v Jocelyn Benson, et al.* (Docket No. 1:19-cv-614) as follows:

1. Voters Not Politicians acknowledges that there are only legal questions at issue in this matter, and that the Court may properly consolidate the hearing of Plaintiffs’ Motion for Preliminary Injunction with the Court’s adjudication of the merits pursuant to Fed. R. Civ. P. 65(a)(2).

2. As discussed in the accompanying brief, and for all of the reasons stated therein, Voters Not Politicians contends that Plaintiffs’ motion has not established any of the required criteria for a grant of preliminary injunctive relief in this matter.

WHEREFORE, Intervenor-Defendant Count MI Vote, d/b/a Voters Not Politicians, respectfully requests that Plaintiffs’ Motion for Preliminary Injunction be denied.

*Respectfully submitted,*

Fraser Trebilcock Davis & Dunlap, P.C.  
Attorneys for Intervenor-Defendant  
Count MI Vote, d/b/a Voters Not Politicians

Dated: September 19, 2019

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 19, 2019, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the attorneys of record.

*Respectfully submitted,*

**FRASER TREBILCOCK DAVIS & DUNLAP, P.C.**

Attorneys for Intervenor-Defendant

Count MI Vote d/b/a Voters Not Politicians

Dated: September 19, 2019

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