

**UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF NEW HAMPSHIRE**

NEW HAMPSHIRE YOUTH MOVEMENT,

Plaintiff,

v.

DAVID M. SCANLAN, in his official capacity
as New Hampshire Secretary of State,

Defendant.

Consolidated Cases
Case No. 1:24-cv-00291-SE-TSM

COALITION FOR OPEN DEMOCRACY,
et al.,

Plaintiffs,

v.

DAVID M. SCANLAN, in his official capacity
as New Hampshire Secretary of State, *et al.,*

Defendants.

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

NOW COME Defendants New Hampshire Secretary of State David M. Scanlan and New Hampshire Attorney General John M. Formella, each in their official capacities (collectively, the “Defendants”), by and through counsel, the Office of the Attorney General, and respectfully move for summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure and Rule 56.1 of the Local Rules for the United States District Court for the District of New Hampshire, in each of the above-captioned consolidated cases.

WHEREFORE, for the reasons stated in Defendants’ attached Memorandum of Law in Support of this Motion Summary Judgment, which is incorporated herein by reference, Defendants respectfully request that this Honorable Court:

- A. Grant summary judgment to Defendant Secretary of State Scanlan and deny Plaintiff New Hampshire Youth Movement the relief it seeks in its First Amended Complaint (ECF No. 50);
- B. Grant summary judgment to Defendants Secretary of State Scanlan and Attorney General Formella and deny Plaintiffs Coalition for Open Democracy, League of Women Voters of New Hampshire, The Forward Foundation, Miles Borne, Alexander Muirhead, by his next friend Russell Muirhead, and Lila Muirhead, by her next friend Russell Muirhead the relief they seek in their First Amended Complaint (ECF No. 85); and
- C. Grant such further relief as is just and equitable.

Respectfully submitted,

DEFENDANTS DAVID M. SCANLAN, in his
official capacity as New Hampshire Secretary of
State and JOHN M. FORMELLA, in his official
capacity as New Hampshire Attorney General

By their attorney,

JOHN M. FORMELLA
ATTORNEY GENERAL

Date: November 7, 2025

/s/ Michael P. DeGrandis
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on all parties of record in the consolidated cases, *New Hampshire Youth Movement v. Scanlan* (1:24-cv-00291-SE-TSM) and

Coalition for Open Democracy, et al. v. Scanlan, et al. (1:24-cv-00312-SE-TSM), through the Court's e-filing system.

/s/ Michael P. DeGrandis

Michael P. DeGrandis