

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

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

WISCONSIN ELECTIONS  
COMMISSION, et al.,

*Defendants.*

3:25-cv-1036-jdp

**MOTION TO DISMISS OF COMMON CAUSE, MELISSA  
ADAMS, AMANDA MAKULEC, AND JAIME RIEFER**

In accordance with Fed. R. Civ. P. 12(b)(6), Intervenor-Defendants Common Cause, Melissa Adams, Amanda Makulec, and Jaime Riefer (collectively, the “Common Cause Intervenors”) move the Court to dismiss the Complaint filed by the United States of America, Dkt. 1. Because the United States has not provided a statutorily sufficient basis and purpose to support the relief it seeks in its Complaint—a demand that the Court order the Wisconsin Elections Commission, its Commissioners, and its Administrator to produce to the United States Wisconsin’s unredacted voter file—the Complaint should be dismissed. Moreover, to the extent necessary, the Court should also deny the United States’ outstanding motion to compel, Dkt. 2. The grounds supporting the Common Cause Intervenors’ Motion to Dismiss are set forth in the accompanying brief, as well as the opening brief submitted by the Wisconsin Elections Commission, Dkt. 58.

WHEREFORE, Intervenor-Defendants Common Cause, Melissa Adams, Amanda Makulec, and Jaime Riefer respectfully request that the Court enter an

order dismissing the United States' Complaint in its entirety and, to the extent necessary, denying the United States' Motion to Compel.

Dated: February 12, 2026

Respectfully submitted,

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