STATE OF MICHIGAN IN THE COURT OF CLAIMS

MICHIGAN SENATE and MICHIGAN
SENATE MAJORITY LEADER WINNIE
BRINKS, in her official capacity,

Plaintiffs, URGENT STATE

CONSTITUTIONAL MATTER

Case No.

Hon.

v

MICHIGAN HOUSE OF REPRESENTATIVES, MICHIGAN HOUSE SPEAKER MATT HALL, in his official capacity, and MICHIGAN HOUSE CLERK SCOTT STARR, in his official capacity,

Defendants.

PLAINTIFFS' 2/3/25 MOTION FOR SUMMARY DISPOSITION

ORAL ARGUMENT REQUESTED IF THE COURT DEEMS IT NECESSARY

Michigan's Trusted Law Firm ACKER P.C.

GOODMAN ACKER, P.C.
MARK BREWER (P35661)
ROWAN CONYBEARE (P86571)
Attorneys for Plaintiffs
17000 W. Ten Mile Road
Southfield, MI 48075
(248) 483-5000
mbrewer@goodmanacker.com
rconybeare@goodmanacker.com

GOODMAN ACKER'R.

Plaintiffs move pursuant to MCR 2.116(C)(10) and Court of Claims Rule 2.119 for summary disposition of the claims in their Verified Complaint as follows:

- 1. There is no genuine issue as to any material fact.
- 2. Plaintiffs incorporate by reference their Verified Complaint and Brief in Support of this Motion.
- 3. Concurrence in this Motion was requested on February 3, 2025, but could not be obtained, necessitating this Motion.

For the reasons stated, Plaintiffs respectfully pray that the Court:

- 1. Grant this Motion;
- 2. Grant the Complaint for Mandamus and order Defendants to immediately present the nine bills to the Governor;
- 3. Issue a declaratory judgment that Defendants have a constitutional duty to present the nine bills to the Governor and that Plaintiffs have the constitutional right to such presentment;
- 4. Grant a permanent injunction enjoining Defendants from failing to immediately present the nine bills to the Governor; and
 - 5. Grant such other relief as the Court considers necessary or appropriate.

Respectfully submitted,

/s/ Mark Brewer

GOODMAN ACKER, P.C. MARK BREWER (P35661) ROWAN CONYBEARE (P86571)

Attorneys for Plaintiffs 17000 W. Ten Mile Road Southfield, MI 48075

(248) 483-5000

mbrewer@goodmanacker.com rconybeare@goodmanacker.com

Dated: February 3, 2025