

**STATE OF MICHIGAN
IN THE COURT OF CLAIMS**

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

Case No.
Hon.

Plaintiffs,

**URGENT STATE
CONSTITUTIONAL MATTER**

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 IMMEDIATE AND EXPEDITED
CONSIDERATION OF 2/3/25 MOTION FOR SUMMARY DISPOSITION**



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NOW COME Plaintiffs, by and through their attorneys, Goodman Acker, P.C., and for their Motion for Immediate and Expedited Consideration of their Motion for Summary Disposition state as follows:

1. Plaintiffs incorporate by reference their Verified Complaint, Motion for Summary Disposition, and Brief in Support of their Motion for Summary Disposition.

2. Unless given immediate effect, laws take effect 90 days after the Legislature adjourns. Const 1963, art 4, § 27. None of the nine bills at issue were given immediate effect, so if signed by the Governor, they will take effect on April 2, 2025, which is fast approaching.

3. But before their effective date other events must occur. The Governor has up to 14 days after presentation to consider bills. *Id* § 33. Moreover, appeals are expected in this matter. To resolve those appeals and allow the Governor her constitutionally mandated period of 14 days to consider a bill after presentation but before the April 2, 2025 effective date of the bills she signs, this matter requires immediate and expedited consideration.

4. In addition, Defendants have no basis to oppose immediate and expedited consideration. Since January 9, 2025, Speaker Hall has been reviewing the legal issues he asserts prevent presentment. *See Eggert, New House Speaker Pushes Elimination of Business Tax Credits to Fund Roads, Questions RenCen Plan, Crain's Business Detroit* (January 9, 2025) (reporting that Speaker Hall's "team is conducting a legal review of [the] nine bills"). Further, the Senate adopted a resolution authorizing this litigation on January 22, 2025, *see* Verified Compl, Ex 1, so the House has known that this Complaint was coming. With nearly four weeks of legal review already done and more than a week's notice of its filing, Defendants should be able to respond quickly to this Complaint that presents solely legal issues.

5. By their Motion for Immediate and Expedited Consideration of their Motion for Summary Disposition, Plaintiffs seek to expedite consideration of this case in every way possible. As such, Plaintiffs request immediate consideration of their Motion for Summary Disposition, an expedited response to their Motion for Summary Disposition, and an expedited hearing on their Motion for Summary Disposition.

6. Concurrence in this Motion was requested on February 3, 2025, but could not be obtained.

WHEREFORE, for the foregoing reasons, Plaintiffs respectfully request that this Motion be granted, that their Motion for Summary Disposition be immediately and expeditiously considered by the Court, and that the Court award the relief sought by the Motion for Summary Disposition.

Respectfully submitted,

/s/ Mark Brewer
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