

No. 24-3051
IN THE UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

NATIONAL REPUBLICAN	:	Certified Question from the
SENATORIAL COMMITTEE, ET AL.,	:	United States District Court
Plaintiffs-Appellants,	:	Southern District of Ohio
v.	:	
FEDERAL ELECTION COMMISSION,	:	District Court Case No.
ET AL.,	:	1:22-cv-639
Defendants-Appellees.	:	
	:	

MOTION OF OHIO AND 12 OTHER STATES FOR LEAVE TO FILE
BRIEF OF *AMICI CURIAE* IN SUPPORT OF PLAINTIFFS-APPELLANTS

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MOTION FOR LEAVE TO FILE BRIEF OF *AMICI CURIAE*

The States of Ohio, Alaska, Arkansas, Indiana, Iowa, Kansas, Kentucky, Louisiana, Mississippi, Nebraska, South Carolina, Texas, and Utah move the Court for leave to file this amicus brief at the *en banc* merits stage. This motion is perhaps unnecessary, as States need not seek leave to file *amici curiae* briefs during either initial consideration of a case on the merits, F.R.A.P. 29(a)(2), or during consideration of whether to grant rehearing, F.R.A.P. 29(b)(2). But because the rules do not expressly permit *amicus* briefs at the *en banc* merits stage, the States respectfully move for leave.

States have strong interests not only in how our citizens select our federal representatives, but also in protecting the associations of those citizens to promote their candidates through political parties. Additionally, the States' own experience with campaign finance further undermines any anticorruption rationale. Thus, the *amici* States have a strong interest in, and relevant knowledge about, the question presented.

For these reasons, this Court should grant the States' motion for leave.

Respectfully submitted,

DAVE YOST
Ohio Attorney General

/s/ T. Elliot Gaiser

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CERTIFICATE OF COMPLIANCE

I hereby certify, in accordance with Rule 32(g) of the Federal Rules of Appellate Procedure, that this motion complies with the type-volume requirements and contains 174 words. *See* Fed. R. App. P. 27(d)(2)(A).

I further certify that this motion complies with the typeface requirements of Federal Rule 32(a)(5) and the type-style requirements of Federal Rule 32(a)(6) because it has been prepared in a proportionally spaced typeface using Microsoft Word in 14-point Equity font.

/s/ T. Elliot Gaiser
T. ELLIOT GAISER

CERTIFICATE OF SERVICE

I hereby certify that on March 11, 2024, this motion was filed electronically. Notice of this filing will be sent to all parties for whom counsel has entered an appearance by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ T. Elliot Gaiser
T. ELLIOT GAISER