

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MAINE

JAMES BAINES, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Civil No.: <u>1:19-cv-00509-LEW</u>
)	
SHENNA BELLOWS, in her official)	
capacity as Secretary of State for the)	
State of Maine,)	
)	
Defendant.)	
)	

PLAINTIFFS’ NOTICE OF SUPPLEMENTAL AUTHORITY

PLEASE TAKE NOTICE THAT the following authorities support Plaintiffs’ claim that they are entitled to the injunctive relief requested in Plaintiffs’ Amended Emergency Motion for Permanent Injunction (Dkt. No. 81):

- *Norman v. Reed*, 502 U.S. 279 (1992) (invalidating Illinois’ signature requirement and placing plaintiff candidates on ballot);
- *Hadnott v. Amos*, 394 U.S. 358 (1969) (invalidating racially discriminatory application of Alabama’s ballot access laws and ordering new election with previously excluded candidates on ballot);
- *Williams v. Rhodes*, 393 U.S. 23 (1968) (invalidating Ohio’s ballot access statutory scheme on ground that it enabled two parties to monopolize the electoral process and placing plaintiff political parties on ballot);
- *New Alliance Party of Alabama v Hand*, 933 F.2d 1568 (11th Cir. 1991) (affirming district court decision invalidating Alabama’s filing deadline and placing plaintiff political party on ballot);
- *MacBride v Exon*, 558 F.2d 443 (8th Cir. 1977) (affirming district court order invalidating Nebraska’s party certification deadline and placing plaintiff candidates on ballot);
- *Libertarian Party of Ohio v. Husted*, 2:13-cv-953 (S.D. Oh. Jan. 7, 2014) (unpublished) (enjoining enforcement of Ohio’s newly-enacted ballot access laws and placing plaintiff political parties on ballot);

- *Green Party of Tennessee v. Hargett*, 882 F Supp 2d 959 (M.D. 2012) (invalidating Tennessee’s filing deadline and placing plaintiff political parties on ballot even though they did not comply with signature requirement);
- *Libertarian Party of Ohio v. Brunner*, 567 F. Supp 2d 1006 (S.D. Oh. 2008) (invalidating Ohio Secretary of State’s ballot access regulation and placing plaintiff political party on ballot);
- *Workers World Party v. Vigil-Giron*, 693 F Supp 989 (D. N.M. 1988) (invalidating New Mexico’s party enrollment requirement and placing plaintiff political party on ballot);
- *Libertarian Party of Nevada v. Swackhamer*, 638 F. Supp 565 (D. Nev. 1986) (invalidating Nevada’s filing deadline and placing plaintiff political party on ballot even though it did not collect the required number of signatures);
- *Blomquist v. Thomson*, 591 F. Supp. 768 (1984) (invalidating Wyoming’s ballot access laws but declining to grant plaintiffs injunctive relief), *rev’d*, 739 F.2d 525 (10th Cir. 1984) (reversing district court’s denial of injunctive relief and directing placement of plaintiff political party on ballot if it met certain conditions);
- *Libertarian Party of Oklahoma v. Oklahoma State Election Board*, 593 F. Supp 118 (W.D. Ok. 1984) (invalidating Oklahoma’s ballot access laws and placing plaintiff political party on ballot even though it had not met signature requirement);
- *Libertarian Party of Nebraska v. Beerman*, 598 F. Supp. 57 (D. Neb. 1984) (invalidating Nebraska’s ballot access laws and placing plaintiff party on ballot provided it submitted required number of signatures within extended filing deadline);
- *Communist Party of Ill. v. Ogilvie*, 357 F. Supp. 105 (N.D. Ill. 1972) (invalidating Illinois’ signature distribution requirement and loyalty oath and placing plaintiff political party on ballot);
- *Socialist Labor Party v. Rhodes*, 318 F. Supp. 1262 (S.D. Oh. 1970) (invalidating Ohio’s signature requirement and placing plaintiff political party on ballot even though it did not attempt to petition);
- *Vogler v. Miller*, 651 P. 2d 1 (Alas. 1982) (invalidating Alaska’s signature requirement and placing plaintiff candidate on ballot even though candidate did not collect the required number of signatures).

Dated: December 29, 2021

Respectfully submitted,

/s/Oliver B. Hall

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CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of December, 2021, the foregoing document was filed using the Court's CM/ECF system, which will effect service upon all counsel of record.

/s/Oliver B. Hall
Oliver B. Hall