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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

EQUALITY STATE POLICY CENTER,

Civil Case No. 25-cv-00117-SWS

Plaintiff,

v.

CHUCK GRAY, in his official capacity as the  
Wyoming Secretary of State, *et al.*,

Defendants.

**THE UNITED STATES’ MOTION FOR LEAVE TO  
FILE A STATEMENT OF INTEREST AS AMICUS CURIAE**

Pursuant to Local Civil Rule 7.1(b)(2)(G), the United States hereby moves the Court for leave to file the attached Statement of Interest in the above-captioned case. *See* Ex. A (Proposed Statement of Interest of the United States). Pursuant to Local Civil Rule 7.1(b)(1)(A), counsel for the government has conferred with counsel for Plaintiff and Defendants regarding this Motion. Counsel for Defendant Secretary Gray consents to the United States’ proposed filing. Counsel for various county clerks have indicated that, as nominal Defendants, they take no position. Counsel for Plaintiff does not contest the right of the government to file a Statement of Interest. By way of background, Plaintiff moved for a preliminary injunction on May 23, 2025. ECF No. 15. Defendant Secretary of State Chuck Gray filed his opposition in response on June 27, 2025. ECF No. 65. Plaintiff replied on June 30, 2025. ECF No. 73.

The Attorney General of the United States is authorized under federal law “to attend to the interests of the United States in a suit pending in a court of the United States[.]” 28 U.S.C. § 517. This case presents important questions regarding enforcement of the Fourteenth Amendments’ voting rights protections, in which the United States has a substantial interest. *See, e.g., Crawford v. Marion Cnty. Election Bd.*, 553 U.S. 181 (2008). The United States has “an interest in . . . honest and fair elections.” *United States v. Gradwell*, 243 U.S. 476, 480 (1917). “Confidence in the integrity of our electoral processes is essential to the functioning of our participatory democracy.” *Purcell v. Gonzalez*, 549 U.S. 1, 4 (2006).

The United States also satisfies the standard for filing an amicus brief. “Participation as an amicus to brief and argue as a friend of the court is a privilege within the sound discretion of the court.” *Tribe v. Ashe*, No. 11-CY-347-J, 2012 WL 12915483, at \*2 (D. Wyo. May 18, 2012) (quoting *Oklahoma ex rel. Edmondson v. Tyson Foods, Inc.*, 2008 WL 1994914, at \*1 (N. D.

Okla. 2008)). The Court should grant leave to file an amicus where the proffered information is “timely, useful, or otherwise necessary to the administration of justice.” *Rock Springs Grazing Ass’n v. Salazar*, No. 11-CV-263-NDF, 2011 WL 13162054, at \*1 (D. Wyo. Dec. 15, 2011) (quoting *Oklahoma v. Tyson Foods, Inc.*, 2008 WL 1994914, at \*1 (N.D. Okla. 2008)). An amicus is particularly useful to the Court “when the amicus has unique information or perspective.” *Id.* As noted above, the United States’ interest is substantial. The United States’ State of Interest filing also would be timely. Plaintiff filed this case on May 23, 2025, ECF No. 1, and this case is at the outset of the litigation. Furthermore, Plaintiff’s motion for a preliminary injunction only became fully briefed yesterday, in advance of the deadline set by the Court. *See* ECF No. 39 (Order granting Plaintiff until July 9, 2025 to file its reply). Accordingly, the Court should grant the United States motion for leave to file the attached Statement of Interest. Ex. A.

Dated: July 1, 2025

Respectfully submitted,

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