

STATE OF MICHIGAN
IN THE SUPREME COURT

RAISE THE WAGE MI,

Case No. 166312

Plaintiff,

v

BOARD OF STATE CANVASSERS,

Defendant.

GOODMAN ACKER, P.C.
MARK BREWER (P35661)
ROWAN CONYBEARE (P86571)
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JOINT MOTION OF THE PARTIES
TO STAY PROCEEDINGS

NOW COMES Plaintiff, Raise the Wage MI, and Defendant, Board of State Canvassers, by their respective counsel, and jointly move to stay proceedings in this matter for the following reasons and grounds.

1. Plaintiff seeks mandamus to compel the Defendant Board to certify its ballot proposal raising the minimum wage for the November 2024 general election ballot.
2. Defendant Board's answer is not due until December 11, 2023.
3. Pending before the Court is another case also involving Michigan's minimum wage law, *Mothering Justice, et al v Nessel, et al*, No 165325, which is set for oral argument on December 7, 2023.

4. The decision of this Court in *Mothering Justice* may affect how the parties proceed in this matter, including a possible voluntary dismissal of the complaint.

WHEREFORE the parties jointly pray that:

1. This motion be granted; and
2. That proceedings in this matter be stayed without prejudice to either party or any party seeking to intervene in this matter until either a) 10 days after the Clerk issues an order or judgment under MCR 7.315(C) in conformance with the decision of this Court in *Mothering Justice*, or b) May 1, 2024, whichever occurs first.

Respectfully submitted,

/s/ Heather S. Meingast _____
Dept. of the Attorney General
HEATHER S. MEINGAST (P55439)
ERIK A. GRILL (P64713)
Attorneys for Defendant

/s/ Mark Brewer _____
Goodman Acker, P.C.
MARK BREWER (P35661)
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Attorneys for Plaintiff

Dated: December 4, 2023

Proof of Service

The undersigned certifies that on December 4, 2023, the foregoing instrument(s) electronically filed the foregoing papers with the Clerk of the Court using the Electronic Filing System which will send notification of such filing to all attorneys of record.

/s/ Elizabeth M. Rhodes
Elizabeth M. Rhodes

