

**FILED**  
**03-01-2024**  
**CLERK OF WISCONSIN**  
**SUPREME COURT**

**No. 24AP232**

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**In the Supreme Court of Wisconsin**

KENNETH BROWN,  
PLAINTIFF-RESPONDENT

*v.*

WISCONSIN ELECTIONS COMMISSION,  
DEFENDANT-CO-APPELLANT,

WISCONSIN ALLIANCE FOR RETIRED AMERICANS, BLACK LEADERS  
ORGANIZING FOR COMMUNITIES, AND DEMOCRATIC NATIONAL  
COMMITTEE,  
INTERVENORS-CO-APPELLANTS,

TARA McMENAMIN,  
DEFENDANT-APPELLANT.

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**PLAINTIFF-RESPONDENT’S MOTION TO RECUSE JUSTICE  
PROTASIEWICZ**

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WISCONSIN INSTITUTE FOR  
LAW & LIBERTY, INC.

RICHARD M. ESENBERG  
LUCAS T. VEBBER  
330 E. Kilbourn Ave., Ste. 725  
Milwaukee, WI 53202  
Phone: (414) 727-9455  
Facsimile: (414) 727-6385

Plaintiff-Respondent Kenneth Brown, by his undersigned counsel, respectfully moves to recuse Justice Protasiewicz from this action pursuant to the Due Process Clause of the Fourteenth Amendment to the United States Constitution, Wis. Stat. §§ 757.19(2)(f), (g), and Wisconsin's Code of Judicial Conduct. The grounds for this motion are set forth in the memorandum of law that accompanies this motion.

Dated: March 1, 2024.

Respectfully submitted,

WISCONSIN INSTITUTE FOR  
LAW & LIBERTY, INC.

*Electronically signed by Lucas T. Vebber*

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Richard M. Esenberg (WI Bar No. 1005622)

Lucas T. Vebber (WI Bar No. 1067543)

330 East Kilbourn Avenue, Suite 725

Milwaukee, WI 53202

Telephone: (414) 727-9455

Facsimile: (414) 727-6385

Rick@will-law.org

Lucas@will-law.org

*Attorneys for Plaintiff-Respondent Kenneth Brown*