

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

ERIC ESSHAKI, as candidate for United
States Congress and in his individual
capacity,

Plaintiff,
and

MATT SAVICH and DEANA BEARD,

Intervenors-Plaintiffs,
v

GRETCHEN WHITMER, Governor of
Michigan, JOCELYN BENSON, Secretary of
state of Michigan, and JONATHAN
BRATER, Director of the Michigan Bureau
of Elections, in their official capacities,

Defendants.

No. 2:20-cv-10831

HON. TERRENCE G. BERG

MAG. ELIZABETH A. STAFFORD

**DEFENDANTS' EMERGENCY
MOTION UNDER RULE 60(B)
FOR LIMITED RELIEF FROM
THE COURT'S ORDER
GRANTING A PRELIMINARY
INJUNCTION, OR
ALTERNATIVELY FOR A STAY
PENDING EMERGENCY
APPEAL**

**RESPONSE REQUESTED AS
SOON AS POSSIBLE BUT NO
LATER THAN FRIDAY APRIL
24, 2020 GIVEN THE NEED TO
EXPEDITE DEFENDANTS'
APPEAL**

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**DEFENDANTS' EMERGENCY MOTION UNDER RULE 60(B) FOR
LIMITED RELIEF FROM THE COURT'S ORDER GRANTING A
PRELIMINARY INJUNCTION, OR ALTERNATIVELY FOR A STAY
PENDING EMERGENCY APPEAL**

Defendants Michigan Governor Gretchen Whitmer, Secretary of State
Jocelyn Benson, and Director of Elections Jonathan Brater (the State Defendants),
in their official capacities, by and through their attorneys, move for limited relief
from the Court's April 20, 2020 order granting a preliminary injunction under Fed.
R. Civ. P. 60(b)(2), or alternatively for a limited stay pending appeal under Fed. R.
Civ. P. 62(c) and Fed. R. App. P. 8(a)(1)(C) of the order granting a preliminary
injunction. In support of their motion, the State Defendants state as follows:

1. Plaintiff Eric Esshaki asked this Court to enjoin the signature requirement
for nominating petitions to qualify as a candidate for the U.S House of
Representatives. He argued the Covid-19 pandemic and the Governor's Stay-at-
Home Orders made it impossible for him to meet the signature requirement by the

April 21, 2020 filing deadline, and as a remedy the Court should reduce his signature requirement by 40%.

2. On April 20, 2020, the Court granted Plaintiff's motion for a preliminary injunction, principally ordering that that the filing deadline be extended to May 8, 2020, that the Director of Elections implement a process for collecting and filing signatures by email, and that the signature thresholds be reduced by 50%.

3. The next day, April 21, 2020, Plaintiff Esshaki appeared at the Michigan Bureau of Elections and timely filed nominating petitions containing signatures in excess of his minimum filing requirement. The filing also revealed that despite his representations and arguments to the Court to the contrary, Plaintiff and his volunteers had been collecting signatures during the time frame covered by the Stay-at-Home orders, and that Plaintiff had also been successful in collecting a significant number of signatures by mail. In other words, Plaintiff met the very requirements from which he sought relief from this Court.

4. The facts of Plaintiff's April 21 filing constitute new evidence that neither the State Defendants nor the Court possessed in responding to and deciding Plaintiff's motion for an injunction. Because this evidence is material and likely would have produced a different result had it been presented to the Court, Defendants seek limited relief from the Court's order under Fed. R. Civ. P

60(b)(2). Specifically, the State Defendants seek relief only from the Court's 50% reduction of the signature thresholds.

5. Alternatively, if the Court denies that requested relief, the State Defendants request this Court stay that portion of its order imposing the 50% signature reduction pending an emergency appeal by Defendants to the Sixth Circuit. The State Defendants are likely to succeed on their narrow appeal of the signature reduction, and the other stay factors weigh in favor of granting Defendants a stay.

6. Time is of the essence because Defendants' requests for relief, if successful, impact the number of signatures candidates will be required to file by May 8, 2020 in order to appear on the August 4, 2020 primary election ballot. Defendants thus ask this Court to grant their motion on an expedited basis.

7. Pursuant to L.R. 7.1, on April 22, 2020, defense counsel sought concurrence in the relief requested in this motion but defense counsel either did not hear back from opposing counsel by the time the motion was filed, or concurrence was not granted, necessitating the filing of this motion.

WHEREFORE, for the reasons more fully set forth in the attached brief, Defendants Governor Gretchen Whitmer, Secretary of State Jocelyn Benson, and Director of Elections Jonathan Brater respectfully request that this Honorable Court grant their motion for limited relief from the Court's order granting Plaintiff Esshaki a preliminary injunction under Fed. R. Civ. P. 60(b). Alternatively, if the

Court denies the request for relief under Rule 60(b), Defendants request that the Court stay that portion of the injunction reducing the signature thresholds by 50% pending Defendants appeal to the Sixth Circuit.

Respectfully submitted,

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Dated: April 22, 2020

CERTIFICATE OF SERVICE

I hereby certify that on April 22, 2020, I electronically filed the above document(s) with the Clerk of the Court using the ECF System, which will provide electronic copies to counsel of record.

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**DEFENDANTS' BRIEF IN
SUPPORT OF EMERGENCY
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**DEFENDANTS' BRIEF IN SUPPORT OF EMERGENCY MOTION
UNDER RULE 60(b) FOR LIMITED RELIEF FROM THE COURT'S
ORDER GRANTING A PRELIMINARY INJUNCTION, OR
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Dated: April 22, 2020

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CONCISE STATEMENT OF ISSUES PRESENTED

1. Whether the Court's order granting preliminary injunctive relief should be amended to exclude the requirement that the signature thresholds be reduced by fifty percent.
2. Whether the portion of the Court's preliminary injunction ordering that signature requirements be reduced by fifty percent should be stayed pending the State Defendants' emergency appeal.

CONTROLLING OR MOST APPROPRIATE AUTHORITY

Authority:

Mich. Comp. Laws § 168.544f

Mich. Comp. Laws § 168.133

Burdick v. Takushi, 504 U.S. 428 (1992)

Coalition to Defend Affirmative Action v. Granholm, 473 F.3d 237 (6th Cir. 2006)

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INTRODUCTION

Plaintiff Eric Esshaki asked this Court to enjoin the signature requirement for nominating petitions to qualify as a candidate for the U.S House of Representatives. He argued the Covid-19 pandemic and the Governor's Stay-at-Home Orders made it impossible for him to meet the signature requirement by the April 21, 2020 filing deadline, and as a remedy the Court should reduce his signature requirement by 40%. On April 20, 2020, the Court granted Plaintiff's motion for a preliminary injunction, ordering, among other things, that the filing deadline be extended to May 8, 2020, that the Director of Elections implement a process for collecting and filing signatures by email, and that the signature thresholds be reduced by 50%. (R. 23, Injunction Order, Page ID ## 359-360.)

The next day, April 21, 2020, Plaintiff Esshaki appeared at the Michigan Bureau of Elections and timely filed nominating petitions containing signatures in excess of the statutorily required minimum filing requirement. The filing revealed that despite his representations and arguments to the Court to the contrary, Plaintiff and his volunteers had been collecting signatures during the time frame covered by the Stay-at-Home orders, and that Plaintiff had also been successful in collecting a significant number of signatures by mail. In other words, Plaintiff met—indeed exceeded—the very requirements from which he sought relief from this Court.

The facts of Plaintiff's April 21 filing constitute new evidence that neither the State Defendants nor the Court possessed in responding to and deciding Plaintiff's motion for an injunction. Because this evidence is material and likely would have produced a different result had it been presented to the Court, Defendants seek limited relief from the Court's order under Fed. R. Civ. P. 60(b)(2). Specifically, the State Defendants seek only relief from the Court's 50% reduction of the signature thresholds.

Alternatively, if the Court denies that request for relief, the State Defendants request this Court stay that portion of its order imposing the 50% signature reduction pending an emergency appeal by Defendants to the Sixth Circuit. The State Defendants are likely to succeed on their narrow appeal of the signature reduction, and the other stay factors weigh in favor of granting Defendants a stay.

Time is of the essence because Defendants' requests for relief, if successful, impact the number of signatures other candidates will be required to file by May 8, 2020 in order to appear on the August 4, 2020 primary election ballot. Defendants thus ask this Court to grant their motion on an expedited basis.

STATEMENT OF FACTS

Plaintiff Eric Esshaki is a registered nurse and licensed attorney running as a Republican candidate for Michigan's Eleventh Congressional District of the United States House of Representatives. (Comp., R. 1, Page ID ## 2, 5, ¶¶ 2, 17). Esshaki

filed his statement of candidacy with the Federal Election Commission on October 31, 2019. (*Id.* ¶ 18.)¹ He also “hired campaign staff and has been diligently campaigning since October 2019.” (*Id.*, ¶ 19.) Under Michigan’s Election Law, as enacted, to gain access to the August 4, 2020 primary ballot, Esshaki was required to file a nominating petition containing at least 1,000 valid signatures from registered voters with Defendant Secretary of State Jocelyn Benson by April 21, 2020. *See* Mich. Comp. Laws §§ 168.133, 168.544f.

Esshaki alleged that “his campaign team implemented a plan to collect the required number of signatures early on in his campaign.” (*Id.*, Page ID # 6, ¶ 21.) He further alleged that, “his campaign team, and several volunteers and supporters have been working diligently, and ha[d] already collected nearly seven hundred (700) valid signatures,” presumably by the time he filed his complaint on March 31, 2020. (*Id.*, Page ID # 6, ¶ 22.)

On March 10, 2020, Defendant Governor Gretchen Whitmer declared a state of emergency and invoked emergency powers in Executive Order No. 2020-4, in response to the spreading pandemic related to Covid-19 and to two confirmed cases in Michigan.² While this order noted the serious nature of the virus, it did

¹ Plaintiff’s statement and filings are available on the Federal Election Commission’s website at <https://www.fec.gov/data/candidate/H0MI11129/>.

² EO No. 2020-4, available at https://www.michigan.gov/whitmer/0,9309,7-387-90499_90705-521576--,00.html.

not restrict the movement or gathering of people in Michigan. On March 13, 2020, Governor Whitmer issued Executive Order 2020-5 prohibiting assemblages of 250 or more people in a single shared space with limited exceptions, and ordering the closure of all K-12 school buildings.³

Esshaki alleged that after President Donald Trump asked people nationwide on March 15, 2020 to begin social distancing in response to the spreading pandemic related to Covid-19, “Esshaki and his campaign postponed *some* of its efforts to collect signatures.” (*Id.*, Page ID ## 6-7, ¶¶ 23-24.) (Emphasis added).

The next day, on March 16, 2020, Governor Whitmer ordered various places of public accommodation, like restaurants, bars, and exercise facilities, to close their premises to the public.⁴ And on March 17, 2020, the Governor issued an order rescinding 2020-5, changing the cap on assemblages to 50 persons in a single shared indoor space, and expanding the scope of exceptions from that cap.⁵

Subsequently, on March 23, 2020, again in response to the spreading Covid-19 pandemic in Michigan, Governor Whitmer issued Executive Order No. 2020-21 (the “Stay-at-Home Order”), which essentially ordered all persons not performing

³ EO No. 2020-5, available at https://www.michigan.gov/whitmer/0,9309,7-387-90499_90705-521595--,00.html.

⁴ EO No. 2020-9, available at, https://www.michigan.gov/whitmer/0,9309,7-387-90499_90705-521789--,00.html. Replaced by EO 2020-20.

⁵ EO No. 2020-11, available at, https://www.michigan.gov/whitmer/0,9309,7-387-90499_90705-521890--,00.html.

essential or critical infrastructure job functions to stay in their place of residence, other than to obtain groceries, care for loved ones, engage in outdoor activity consistent with social distancing, and other limited exceptions.⁶ The order also prohibited, with limited exceptions, all public and private gatherings of any number of people that are not part of a single household.⁷ That order was to continue through April 13, 2020, however, on April 9, 2020, the Governor issued Executive Order 2020-42, extending the Stay-at-Home Order through April 30, 2020.⁸ A violation of an Executive Order, like the Stay-at Home-Order, is punishable as a misdemeanor. Mich. Comp. Laws § 10.33.

As noted by Esshaki, the Stay-at-Home Order does not create an express exception from its restrictions for candidates and campaign staff. (R. 1, Compl., Page ID # 8, ¶ 29). He asserted that he attempted to obtain signatures by mail, and that while he sent out 1,000 pieces, he only obtained 15 signatures in return. (R. 10, Esshaki Reply, Page ID # 159.) He alleged that the Governor's Stay-at-Home Order makes it impossible for him "to obtain the required number of elector signatures by April 21, 2020." (*Id.*, ¶ 36).

⁶ EO No. 2020-21, available at https://www.michigan.gov/whitmer/0,9309,7-387-90499_90705-522626--,00.html.

⁷ (*Id.*)

⁸ EO No. 2020-42, available at https://content.govdelivery.com/attachments/MIEOG/2020/04/09/file_attachments/1423850/EO%202020-42.pdf.

A. Statutory Requirements

Mich. Comp. Laws § 168.133 provides the filing deadline for nominating petitions for the office of U.S House of Representatives. Under the statute, this year's deadline for filing a nominating petition to gain access to the August 4, 2020 primary election ballot was April 21, 2020. Similar statutes impose the same filing deadline for candidates seeking other offices. *See, e.g.*, Mich. Comp. Laws § 168.413 (circuit court candidates), § 168.467b (district court candidates). (*See also* R. 6, Defs Resp to TRO, Ex 1, Page ID # 123).

Mich. Comp. Laws § 168.544f, sets the signature requirement for Esshaki as a congressional candidate for the House based on the population of the congressional district. That statute requires him to submit a nominating petition containing at least 1,000 valid signatures. (*Id.*) Section 544f also provides the signature requirements for all other offices for which nominating petitions must be filed. (*See* R. 6, Defs Resp to TRO, Ex 1, Page ID # 123.)

The filing deadline for nominating petitions is just one of many deadlines that regulate the election processes leading up to an election, and relevant here, leading up to the August 4, 2020 primary election.⁹ The deadline for nominating petitions helps ensure that the filing official responsible for canvassing such

⁹ See 2020 Michigan Election Dates, pp 6-9, available at https://www.michigan.gov/documents/sos/2020_Elec-Dates-Booklet_ED-12_10-09-19_668275_7.pdf.

petitions has time to perform the canvass, and that the slate of candidates can be properly certified, and that ballots can be printed, proofed, and ready for delivery by the local clerks to absent ballot voters, including military and overseas voters.¹⁰

The relevant deadlines for the August primary include:

Date and Time¹¹	Action	Statute
By 4:00 pm on April 21	Candidates for partisan office must file nominating petitions and Affidavit of Identity for the August Primary	MCL 168.133
By 4:00 pm on April 24	Deadline for candidates to withdraw from the August Primary	MCL 168.134
April 28	Deadline to submit challenges against nominating petitions filed by partisan candidates to filing official	MCL 168.552
June 2	Board of State Canvassers completes canvass of nominating petitions filed by candidates for the August Primary; Secretary of State certifies candidates eligible to appear on August primary ballot to county election commissions.	MCL 168.552
June 5	Approximate date county clerks will begin printing ballots for the August Primary	
June 20	Delivery of military and overseas AV ballots must begin	MCL 168.759a
June 20	Deadline for county clerks to deliver AV ballots for the August Primary to local clerks	MCL 168.714
June 25	Deadline for AV ballots to be made available to voters	Mich. Const., Art. 2 § 4
By 4:00 pm on July 24	Write-in candidates file Declaration of Intent form	MCL 168.737a
August 4	State Primary	

¹⁰ (*Id.*)

¹¹ All times are 5:00 pm unless otherwise specifically noted.

With respect to congressional candidates like Esshaki, after the filing deadline expires, interested parties have the opportunity to submit challenges against the nominating petitions to the Bureau of Elections within seven days. Mich. Comp. Laws § 168.552. The petitions and any challenges must be canvassed by staff to determine the number of facially valid signatures by reviewing each petition sheet for facial defects such as heading errors, circulator errors, or incomplete signor information like omitted date or address. The Bureau then completes a staff report containing recommendations to the Board of State Canvassers, which must be made available at least two full business days prior to the Board's meeting where it will determine the sufficiency of the nominating petitions. Mich. Comp. Laws § 168.552(10). The Board of State Canvassers must meet and complete the canvass of all nominating petitions by June 2, 2020. Mich. Comp. Laws § 168.552(11). That same day, the Secretary of State must certify the names of candidates eligible to appear on the August primary ballot to the local county clerks who will commence printing. (*Id.*)

B. Procedural History

Plaintiff Esshaki filed his complaint for declaratory and injunctive relief, along with a motion for a temporary restraining order on March 31, 2020. (R. 1, Compl. Page ID ## 1-39; R. 2, Mtn & Brf for TRO, Page ID ## 40-85). On April 1, 2020, the Court and the parties, represented by counsel, conducted a telephone

conference to discuss Plaintiff's motion. Defendants agreed to submit a response to the motion by Friday, April 10, 2020, and did so. (*See* R. 6, Defs Resp to TRO, Page ID # 95.)

Motions to intervene were filed by two judicial candidates on April 14 and 15, 2020, respectively. (R. 11, Savich Mtn, Page ID # 169; R. 17, Beard Mtn., Page ID # 287). Amicus curiae briefs in support of Plaintiff Esshaki were filed by the Michigan branch of the American Civil Liberties Union, (R. 14, Mtn, Page ID # 238; R. 15, ACLU Brf, Page ID # 242), and by Daniel Finley, another judicial candidate, (R. 7, Mtn, Page ID # 126; R. 13, Finley Brf, Page ID # 194) on April 14, 2020. An amicus brief in support of State Defendants was filed by Whitney Williams, a competing candidate for the Eleventh Congressional District, on April 15, 2020. (R. 20, Mtn, Page ID # 321; R. 21, Williams Brf., Page ID # 314).

The Court held a videoconference hearing on Plaintiff's motion on Wednesday, April 15, 2020. And at 12.27 a.m. on Monday, April 20, 2020, the Court entered an order granting a preliminary injunction. (R. 23, Injunction Order, Page ID # 321.) The Court also granted the motions to intervene by Savich and Beard, and the motions to file amicus briefs. (R. 22, Order, Page ID # 318). In its injunction, the Court ordered "that all candidates":

(i) who filed a statement of organization under the Federal Election Campaign Act of 1971, 52 U.S.C. §§ 30101 *et seq.*, or established a candidate committee under the Michigan Campaign Finance Law, Mich. Comp. Laws §§ 169.201 *et seq.*, before March 10, 2020; and

(ii) who are required by a relevant section of the Michigan Election Law, Mich. Comp. Laws §§ 168.1 *et seq.*, to file a nominating petition by April 21, 2020, for the purpose of appearing on the August 4, 2020, primary election ballot; and

(iii) who do not have the option under Michigan Election Law to appear on the August 4, 2020, primary election ballot through the payment of a filing fee in lieu of filing a nominating petition;

Shall be qualified for inclusion on the August 4, 2020 primary election ballot *if the candidate submits **fifty percent** of the number of valid signatures required by Mich. Comp. Laws § 168.544f* with the appropriate filing official as provided by Michigan Election Law by 5:00 p.m. on May 8, 2020. No other filing deadline is extended under this Order. [R. 23, Injunction Order, Page ID # 359-360 (emphasis added).]

The Court further ordered Defendant Director of Elections to implement, within 72 hours, a process “providing for an additional optional procedure that allows the collection and submission of ballot petition signatures in digital form by electronic means such as email.” (*Id.*, Page ID # 360.)¹² And finally, the Director of Elections was ordered to take all reasonable steps to inform local election officials of the terms of the Court’s injunction. (*Id.*)

As entered, the Court’s order applies to the offices of U.S. Senate, U.S. Congress, Wayne County Community College (WCC) Trustee, all judicial offices (but only for candidates who are not the current incumbent), and any city office

¹² That process has been implemented. See the Bureau of Elections’ website at <https://www.michigan.gov/sos/0,4670,7-127-1633---,00.html>.

where the city charter does not allow the option to file with a fee.¹³ All of the covered offices file nominating petitions with the Secretary of State,¹⁴ except for the WCC Trustee, which are filed with the Wayne County Clerk, and the city offices, which are filed with the relevant city clerk. The State Defendants also understand the order as applying to candidates within the covered offices who filed nominating petitions prior to the Court's issuance of the injunction. In other words, candidates who filed nominating petitions early and met the requisite signature filing threshold would have until May 8, 2020 to supplement their filings, and would be subject to the 50% signature reduction.

ARGUMENT

I. The order granting preliminary injunctive relief should be amended to exclude the requirement that the signature thresholds be reduced by fifty percent for all candidates who otherwise meet the terms of the order.

The State Defendants move for relief from the Court's April 20, 2020 order granting a preliminary injunction. Fed. R. Civ. P. 60(b)(2) provides that "[o]n motion and just terms, the court may relieve a party . . . from a[n] . . . order" based

¹³ See the Bureau of Elections' website at https://www.michigan.gov/documents/sos/Webpage_Update_Final_688056_7.pdf.

¹⁴ See 2020 Michigan Candidate Listing for August Primary, available at https://miboecfr.nictusa.com/election/candlist/2020PRI_CANDLIST.html, for up to date filings.

on “newly discovered evidence that, with reasonable diligence, could not have been discovered in time to move for a new trial under Rule 59(b).”

To prevail on a motion under Rule 60(b)(2) based on newly discovered evidence, a party “must demonstrate (1) that it exercised due diligence in obtaining the information and (2) [that] the evidence is material and controlling and clearly would have produced a different result if presented before the original judgment.” *HDC, LLC v. City of Ann Arbor*, 675 F.3d 608, 615 (6th Cir. 2012) (quoting *Good v. Ohio Edison Co.*, 149 F.3d 413, 423 (6th Cir. 1998)). The newly discovered evidence “must have been previously unavailable.” *Id.* (citing *GenCorp. Inc. v. Am. Int’l Underwriters*, 178 F.3d 804, 834 (6th Cir. 1999)).

In his motion for temporary restraining order filed March 31, 2020, Plaintiff argued that enforcement of the filing deadline and the signature requirement against him was unconstitutional because “Defendants have stripped candidates like Esshaki of the ability to meet these requirements because the Stay-home Order prohibits Esshaki from leaving his home for non-essential purposes like signature gathering.” (R. 2, TRO Brf, Page ID # 53). (*Id.*) He argued that the Stay-at-Home Order “further requires Esshaki to maintain a distance of six feet from voters in his district, which effectively eliminates any possibility of electors to provide their signatures without themselves having violated the Order.” (*Id.*) And that taken together, the statutes and “the Stay-home Order impose burdens so severe that they

‘function as an *absolute* bar’ to Esshaki getting his name on the August 2020 primary ballot.” (*Id.*, quoting *Graveline, et al v. Benson, et al.*, 336 F. Supp. 3d 801, 809 (E.D. Mich. 2018) (emphasis added).

In his declaration in support of his motion, Plaintiff asserted that the Stay-at-Home Order impeded or prohibited him from continuing to gather signatures in person. (R. 2, TRO Brf, Ex A, Esshaki Dec, Page ID ## 61, 66.) He complained that without relief, he would have lost a substantial amount of time and money or would have been required to spend “a substantial amount of time and money” to attempt to collect signatures by mail “when there is no evidence that such a strategy would yield even one additional signature.” (*Id.*)

Plaintiff essentially repeated these arguments in his reply brief filed April 14, 2020. (R. 10, Plfs Reply, Page ID ## 156, 157-158, 162, 164.) Plaintiff also expounded upon his efforts to secure signatures by mail, asserting that he mailed approximately 1,000 petitions on or around April 2, at a cost of \$1.75 per piece, and that as of April 14, he had received “approximately 15 signatures by mail,” and that this equated to a price of \$115.00 per signature. (*Id.*, Page ID # 159.) “Thus, Esshaki would be required to spend around \$45,000 to obtain the additional 400 signatures needed.” (*Id.*) For relief, Plaintiff requested a 40% reduction in signatures, which would “reduce the burden on Esshaki and other similarly situated candidates.” (*Id.*, Page ID # 166).

The Court was persuaded by Plaintiff's arguments to grant injunctive relief. First, the Court found that the State's argument that Plaintiff was not sufficiently diligent in collecting signatures to be unsupported in the record, while Plaintiff attested that they had events planned for late March and April that had to be cancelled after the Governor's Order. (R. 23, Injunction Order, Page ID ## 334-335.) Second, the Court rejected the State's argument that Plaintiff should have increased signature collection efforts after the Governor's State of Emergency Declaration, as that would have gone against the advice and guidance offered by the government at the time. (*Id.*, Page ID # 336.) Third, the Court rejected the argument that collecting signatures by mail was a sufficient alternative to in-person signature gathering. The Court found that utilizing the mail-based signature gathering method was less effective and more expensive. (*Id.*, Page ID # 337.) This finding was based upon Plaintiff's alleged efforts, in which he mailed 1,000 petitions at a cost of \$1.75 each and received only 14 additional signatures, at an effective cost of \$115 per signature. (*Id.*) The Court noted that while a candidate is not entitled to free access to the ballot, the sudden and unforeseen necessity of a mail-only signature gathering effort was "far more" than an incidental expense and was potentially prohibitive. (*Id.*, Page ID # 338). The Court also observed that the efficacy of a mail-only effort was—in the context of this pandemic—unproven and questionable. (*Id.*, Page ID ## 339-340). Lastly, the

Court rejected the State's argument that Plaintiff's ability to alternatively run as a write-in candidate reduced the severity of the burden.

Having concluded that the burden on Plaintiff was severe, the Court then considered whether the signature requirements were narrowly drawn to advance compelling state interests. (*Id.*, Page ID ## 342-343). As to the number of signatures required, the Court held that even if the state interests in ensuring a modicum of support for a candidate were compelling, the regulatory means were not narrowly tailored in the context of the COVID-19 pandemic. (*Id.*, Page ID ## 344-345). The Court observed that under normal circumstances, gathering one thousand signatures, as Esshaki was otherwise required to do, would be an indication of the candidate's popular support. (*Id.*, Page ID # 345.) But the Court found that the Governor's Stay-at-Home Order effectively halted the ability to gather signatures after March 23, and there was no other state action to reduce the number of signatures required in proportion to the reduction in time to gather them. (*Id.*, Page ID # 345.) Stated differently, even if the State normally had a compelling interest in enforcing the signature requirement, the State had not shown that it has a compelling interest in enforcing the same number of signatures in the context of the pandemic. (*Id.*, Page ID # 346.)

As a remedy, the Court determined that it would reduce the number of signatures, extend the deadline for submission to May 8, and expand the available

means of gathering signatures to include electronic means. (*Id.*, Page ID # 355). And after concluding that a reasonably diligent candidate should have expected to reach the halfway point for signature gathering when just a month remained, the Court held that the number of signatures required should similarly be reduced by 50%. (*Id.*, Page ID # 358). The Court entered its order granting injunctive relief on April 20, 2020.

The very next day, on April 21, 2020, Plaintiff Esshaki personally appeared at the Michigan Bureau of Elections at approximately 10:30 a.m. to file his nominating petitions before the 4:00 p.m. statutory deadline. (Ex A, Malerman Dec, ¶ 4). A review of his filing revealed that 793 of Plaintiff's signatures were collected before the Governor's March 23 Stay-at-Home Order. (*Id.*, ¶ 5(h).) Another 242 signatures were collected between April 9 and April 20, 2020, by Plaintiff Esshaki and other volunteer circulators, which was after issuance of the Stay-at-Home Orders, and presumably were collected through some appropriate form of in-person interaction between the circulator and the signer. (*Id.*, ¶¶ 3, 5(a)-(e).) And another 228 signatures appear to have been collected by mail between April 7 and April 19, 2020, which again was after issuance of the original or the extended Stay-at-Home Orders. (*Id.*, ¶ 5(f)-(g).) Thus, despite Esshaki's representations in his pleadings and at the hearing that the Stay-at-Home Orders were prohibiting him and/or his volunteers from collecting signatures, and that a

mail campaign was not feasible because of costs, response rate, and trouble with the post office, he secured a substantial number of additional signatures after the issuance of those orders and many by mail. As a result, Plaintiff timely filed approximately 1,263 signatures, more than 25% (or 263 signatures) over the minimum number of signatures required by § 544f, and far in excess of the 50% reduction (or 500 signatures) ordered by the Court. (*Id.*, ¶ 6(a)-(b).) Under the terms of the Court’s order, Plaintiff remains free to supplement this filing with additional signatures until the extended filing deadline expires at 5:00 p.m. on May 8, 2020. (*Id.*, ¶ 7.)

This evidence of Plaintiff’s April 21 filing is new evidence that State Defendants could not have produced in opposition to Plaintiff’s motion for an injunction because the evidence was not yet available to them. *HDC, LLC*, 675 F.3d at 615.¹⁵ But the State Defendants have exercised diligence in bringing it to the Court’s attention upon discovering the information on April 21. (*Id.*) Further, Defendants believe that this evidence “is material and controlling and clearly would have produced a different result” had it been “presented” to the Court before

¹⁵ Rule 60(b)(6) also permits a court to grant relief for “any other reason that justifies” it; however, the rule applies only in “exceptional and extraordinary circumstances not addressed by the first five subsections of Rule 60(b).” *Jinks v. AlliedSignal, Inc.*, 250 F.3d 381, 387 (6th Cir. 2001). Should the Court not agree the filing presents new evidence, Rule 60(b)(6) also supports relief here because this is an “unusual and extreme situation[] where principles of equity mandate relief.” *Olle v. Henry & Wright Corp.*, 910 F.2d 357, 365 (6th Cir. 1990).

the Court entered the April 20, 2020 order granting Plaintiff a preliminary injunction. (*Id.*) Surely some or all of this information was available to Plaintiff and could, or arguably should, have been provided to the Court before April 20, 2020.

Plaintiff Esshaki is the principal Plaintiff in this case, the only party who moved for an injunction, and the Court focused on his claims in its order.¹⁶ And as demonstrated above in the discussion of the Court's order, the Court very clearly relied upon, and was persuaded by, Plaintiff Esshaki's representations and argument that the Covid-19 pandemic and the Governor's orders would ultimately prohibit him from collecting sufficient signatures by the April 21 deadline. The Court was also plainly persuaded by Plaintiff's representations and argument that collecting signatures by mail was not a viable or sufficient alternative to in-person signature gathering. Just reading the Court's order, it could hardly be disputed that Esshaki's representations as to his inability to comply with the law due to the Governor's orders formed the basis for the Court's grant of relief.

¹⁶ The Court granted motions to intervene filed by Matt Savich and Deana Beard after the April 15 hearing, (R. 22, Order granting intervention), and stated that because Defendants had not been able to respond to the intervenors, the Court's "Order focuses primarily on Mr. Esshaki's arguments, and refers to him as 'Plaintiff.'" (R. 23, Injunction Order, Page ID # 323, n 5.)

And in that case, it is difficult to believe that the Court would have reached the same conclusions or granted the same relief had it possessed the new evidence showing that Plaintiff was able to do everything he professed he could not given the pandemic and the Governor's orders. Defendants believe that this new evidence would support relieving them from the terms of the Court's injunction in its entirety. But that is not what the State Defendants request in this brief. Defendants previously conceded to the Court that extending the filing deadline to May 8 could be done without causing significant harm to the primary election schedule. Defendants also proposed to formulate a process to permit candidates with nominating petitions due by April 21 to collect and file signatures by email. Defendants thus do not seek relief from those terms of the Court's injunction.

But Defendants *do* request relief from the requirement that signature thresholds be reduced by 50% for all candidates under the terms of the injunction. The State Defendants argued against a reduction of signatures in their brief in opposition to the motion for a temporary restraining order, and maintained that position throughout the injunction hearing, and do so here again. The Court could only have ordered the signature reduction on the basis that Plaintiff Esshaki had demonstrated he was entitled to such relief based on his arguments that he could not meet the requirement. But as noted above, the new evidence shows that Plaintiff met the signature requirement by filing over 1,200 signatures. He did not

and does not require the relief he sought. And under those circumstances, it was and is a clear intrusion into the State's prerogative to prescribe time, place, and manner restrictions for holding elections. U.S. Const. art. I, § 4, cl. 1; Mich. Const. 1963, art. 2, § 4(2); *Burdick v. Takushi*, 504 U.S. 428, 433 (1992). To the extent Plaintiff is concerned that he may need additional signatures as a cushion, as noted above, he may supplement his filing. Moreover, pursuant to the Court's order, he now has the additional option of collecting signatures by email. Accordingly, the State Defendants respectfully request that this Court grant their motion for limited relief from the Court's April 20, 2020, order and excise the 50% reduction in signatures.

II. Alternatively, the portion of the Court's preliminary injunction ordering that signature requirements be reduced by fifty percent should be stayed pending the State Defendants' emergency appeal.

If the Court denies Defendants' motion under Rule 60(b), the State Defendants alternatively request that this Court stay its order granting the preliminary injunction to the extent it orders a 50% reduction in signatures, pending Defendants appeal to the Sixth Circuit.

The standard for a stay pending appeal of the grant of a preliminary injunction is as follows:

[W]e consider "(1) the likelihood that the party seeking the stay will prevail on the merits of the appeal; (2) the likelihood that the moving party will be irreparably harmed absent a stay; (3) the prospect that others will be harmed if the court grants the stay; and (4) the public

interest in granting the stay.” All four factors are not prerequisites but are interconnected considerations that must be balanced together. [473 F.3d 237, 244 (6th Cir. 2006) (citations omitted).]

Coalition to Defend Affirmative Action v. Granholm, 473 F.3d 237, 244 (6th Cir. 2006) (citations omitted). It bears repeating that a preliminary injunction is an extraordinary remedy, *Jones v. Caruso*, 569 F.3d 258, 265 (6th Cir. 2009), which is to be granted only if the movant carries its burden of proving that the circumstances clearly demand it. *Overstreet v. Lexington-Fayette Urban County Government*, 305 F.3d 566, 573 (6th Cir. 2002). Every factor of this balancing test supports an emergency stay.

A. The State Defendants are likely to prevail on the merits of their narrow appeal regarding the signature reduction.

The Court concluded that Plaintiff Esshaki demonstrated a substantial likelihood of success on the merits of his claim that Mich. Comp. Laws §§ 168.133, 168.544f, and the Governor’s Stay-at-Home Orders, as applied in combination to Plaintiff, unconstitutionally burdened Plaintiff’s First and Fourteenth Amendment associational rights. (R. 23, Injunction Order, Page ID ## 330-346). To remedy the burden, the Court extended the filing deadline to May 8, ordered the implementation of a process for collecting signatures by email, and reduced the signature thresholds by 50%. (*Id.*, Page ID # 359-360).

The State Defendants are appealing only the Court’s decision to order the 50% across-the-board reduction in signatures. In evaluating the State Defendants’

likelihood of prevailing on appeal, the Court must consider the likelihood that Defendants can “show that the [] court abused its discretion in granting the preliminary injunction.” *U.S. Student Ass’n Found. v. Land*, 546 F.3d 373, 380 (6th Cir. 2008). Under the abuse-of-discretion standard, an “injunction will seldom be disturbed unless the district court relied upon clearly erroneous findings of fact, improperly applied the governing law, or used an erroneous legal standard.” *Mascio v. Pub. Emps. Ret. Sys. of Ohio*, 160 F.3d 310, 312 (6th Cir. 1998).

The State Defendants maintain that the Court abused its discretion in ordering the signature reduction because the Court, albeit unknowingly, relied upon what were premature and ultimately unfounded representations and arguments by Plaintiff Esshaki that a signature reduction was necessary because he otherwise would not be able to meet the signature requirement by the filing deadline due to the pandemic and the Governor’s orders. But as discussed above in Argument I, Esshaki met the filing deadline and the signature requirement, and surely knew or should have known before the Court’s order that he had or was likely to meet the requirement. Thus, there was no factual or legal basis upon which the Court could ground its order to reduce the signature requirement, and granting such relief was an abuse of discretion.

But even if that reliance was not an abuse of discretion per se, the Court nevertheless went beyond what was necessary to alleviate Plaintiff's burden as alleged under the circumstances. While the Court concluded that § 544f contributed to the severe burden imposed on Plaintiff, that conclusion did not necessarily compel the conclusion that any remedy include a reduction in required signatures. The reduction in signatures is an unprecedented disruption to the established and traditional process for candidates to gain ballot access in Michigan. The State has a compelling interest in requiring candidates to demonstrate the required modicum of support as established by the Legislature. *See Jenness v. Forton*, 403 U.S. 431, 442 (1971) ("There is surely an important state interest in requiring some preliminary showing of a significant modicum of support before printing the name of a [] candidate on the ballot—the interest, if no other, in avoiding confusion, deception, and even frustration of the democratic process at the general election."); *Bullock v. Carter*, 405 U.S. 134, 145 (1972); *American Party of Texas v. White*, 415 U.S. 767, 783 (1974); *Munro v. Socialist Workers Party*, 479 U.S. 189, 194 (1986); *Timmons v. Twin Cities Area New Party*, 520 U.S. 351, 367 (1997). Recognizing that to be the case, the State Defendants proposed to the Court the less disruptive option of extending the administrative filing deadline. And combined the extension with an additional option of

permitting candidates to collect and file signatures by email, along with the pre-existing method of circulating by U.S. mail.

The extension of the filing deadline to May 8, and the implementation of a simple process permitting candidates to collect and file signatures via email, in addition to the mail option already available and in use by candidates, would have been sufficient to alleviate the alleged burden to Plaintiff Esshaki. It was thus unnecessary, and an abuse of discretion, for the Court to impose the additional remedy of a signature reduction. Indeed, the Supreme Court “has repeatedly emphasized that lower federal courts should ordinarily not alter the election rules on the eve of an election.” *Republican Nat’l Comm. v. Democratic Nat’l Comm.*, 2020 WL 1672707 (U.S., April 6, 2020) (citing *Purcell v. Gonzalez*, 549 U.S. 1 (2006) (*per curiam*); *Frank v. Walker*, 574 U.S. 929 (2014); *Veasey v. Perry*, 574 U. S. ___, 135 S. Ct. 9 (2014)). While the State was not necessarily on the eve of the August 4, 2020 primary election, the Court’s order was on the eve of the filing deadline, and significantly altered the rules for candidates by substantially lowering the signature threshold. The 50% reduction presents an opportunity for frivolous candidacies, voter confusion, and a cluttered ballot, even under current conditions. *See, e.g., Libertarian Party of Ky v. Grimes*, 835 F.3d 570, 577 (6th Cir. 2016) (States have “an important interest in ensuring that candidates demonstrate a ‘significant modicum of support,’ before gaining access to the

ballot, primarily in order to avoid voter confusion, ballot overcrowding, and frivolous candidacies.

Finally, the Court's imposition of a 50% signature reduction went beyond Plaintiff's requested 40% reduction. The Court, without any discernable basis, concluded that a reasonably diligent candidate should have expected to reach the halfway point for signature gathering with a month remaining before the deadline, and held that the number of signatures required should similarly be reduced by 50%. (R. 23, Injunction Order, Page ID # 358).

The Supreme Court recently reversed portions of an injunction in an elections case in part because the court granted relief that the plaintiffs had not even requested. *See Republican Nat'l Comm. v. Democratic Nat'l Comm.*, 2020 WL 1672707 at *1 (U.S., April 6, 2020) ("Our point is not that the argument is necessarily forfeited, but is that the plaintiffs themselves did not see the need to ask for such relief. By changing the election rules so close to the election date and by affording relief that the plaintiffs themselves did not ask for in their preliminary injunction motions, the District Court contravened this Court's precedents and erred by ordering such relief."). The same is true here. Thus, the Court erred or abused its discretion in ordering a 50% reduction in signatures.

B. The State Defendants will be irreparably harmed absent a stay and the public interest weighs in favor of a stay.

The Supreme Court has recognized that “anytime a State is enjoined by a court from effectuating statutes enacted by representatives of its people, it suffers a form of irreparable injury.” *Maryland v. King*, 133 S. Ct. 1, *3 (2012) (C.J. Roberts in chambers) (quoting *New Motor Vehicle Bd. of Cal. v. Orrin W. Fox Co.*, 434 U.S. 1345, 1351 (1977)). The election law enjoined by the Court, Mich. Comp. Laws § 168.544f, was duly enacted by the Michigan Legislature. Moreover, the people have an interest in the fair and orderly holding of elections. These factors thus weigh in favor of staying the injunction. *See Nader v. Blackwell*, 230 F.3d 833, 835 (6th Cir. 2000) (noting that “[a] state’s interest in proceeding with an election increases as time passes, decisions are made, and money is spent.”).

Finally, “[t]he probability of success that must be demonstrated is inversely proportional to the amount of irreparable injury plaintiffs will suffer absent the stay. Simply stated, more of one excuses less of the other.” *Michigan Coal of Radioactive Material Users, Inc. v. Griepentrog*, 945 F.2d 150, 153 (6th Cir. 1991). Given that Plaintiff is unlikely to succeed on the merits on appeal, *see* the arguments presented in II.A., Defendants have a lower burden concerning their irreparable harm.

C. The threat of harm to others is outweighed by the other factors.

The Court's injunction applies to any non-party candidate that meets the terms of the Court's order. (R. 23, Injunction Order, Page ID ## 359-360.) This means that candidates other than Plaintiff Esshaki could benefit from the Court's signature reduction, but the number of such individuals is unknown. These candidates, however, will still benefit from the Court's extension of the filing deadline and the additional opportunity to collect and file signatures electronically via email—even though there now exists little to no record evidence that a candidate would be prevented from collecting the requisite number of signatures during the pandemic—especially given the extension of deadlines. Further, as discussed above, the likelihood of success and irreparable harm factors weigh in favor of Defendants, and thus outweigh the indistinct harm to other candidates.

CONCLUSION AND RELIEF REQUESTED

For the reasons stated above, Defendants Governor Gretchen Whitmer, Secretary of State Jocelyn Benson, and Director of Elections Jonathan Brater respectfully request that this Honorable Court grant their motion for limited relief from the Court's order granting Plaintiff Esshaki a preliminary injunction under Fed. R. Civ. P. 60(b). Alternatively, if the Court denies the request for relief under Rule 60(b), Defendants request that the Court stay that portion of the injunction

reducing the signature thresholds by 50% pending Defendants appeal to the Sixth Circuit.

Respectfully submitted,

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Dated: April 22, 2020

CERTIFICATE OF SERVICE

I hereby certify that on April 22, 2020, I electronically filed the above document(s) with the Clerk of the Court using the ECF System, which will provide electronic copies to counsel of record.

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

ERIC ESSHAKI, as candidate for United
States Congress and in his individual
capacity,

Plaintiff,
and

MATT SAVICH and DEANA BEARD,

Intervenors-Plaintiffs,
v

GRETCHEN WHITMER, Governor of
Michigan, JOCELYN BENSON, Secretary of
state of Michigan, and JONATHAN
BRATER, Director of the Michigan Bureau
of Elections, in their official capacities,

Defendants.

No. 2:20-cv-10831

HON. TERRENCE G. BERG

MAG. ELIZABETH A. STAFFORD

**DEFENDANTS' EMERGENCY
MOTION UNDER RULE 60(B)
FOR LIMITED RELIEF FROM
THE COURT'S ORDER
GRANTING A PRELIMINARY
INJUNCTION, OR
ALTERNATIVELY FOR A STAY
PENDING EMERGENCY
APPEAL**

**RESPONSE REQUESTED AS
SOON AS POSSIBLE BUT NO
LATER THAN FRIDAY APRIL
24, 2020 GIVEN THE NEED TO
EXPEDITE DEFENDANTS'
APPEAL**

EXHIBIT LIST

A. Declaration of Melissa Malerman

EXHIBIT A

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

ERIC ESSHAKI, as candidate for
United States Congress and in his
individual capacity,

Plaintiff,
and

MATT SAVICH and DEANA BEARD,

Intervenors-Plaintiffs,
v

No. 2:20-cv-10831

HON. TERRENCE G. BERG

MAG. ELIZABETH A.
STAFFORD

GRETCHEN WHITMER, Governor of
Michigan, JOCELYN BENSON,
Secretary of state of Michigan, and
JONATHAN BRATER, Director of the
Michigan Bureau of Elections, in their
official capacities,

Defendants.

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DECLARATION OF MELISSA MALERMAN

I, Melissa Malerman, state as follows:

1. I am the Director of the Disclosure, Filings and Compliance Division and a licensed Michigan attorney, (P58884), with the Michigan Department of State, Bureau of Elections. Among other duties, my responsibilities include management and administration of the ballot access process for congressional candidates who are required to file nominating petitions with the Secretary of State. I oversee the challenge process when an opposing candidate alleges that a competitor failed to satisfy the legal requirements of the Michigan Election Law, 1954 P.A. 116, Mich. Comp. Laws. §§ 168.1 *et seq.*, pertinent to qualifying for placement on the ballot. Additionally, I prepare the

necessary documentation for the Board of State Canvassers and Secretary of State to certify the listing of eligible candidates for placement on the August 4, 2020 primary ballot. Mich. Comp. Laws, § 168.552(11), (14).

2. I bring this declaration in support of Defendants' Emergency Motion for Relief from the Court's Order Granting Motion for Preliminary Injunction, or alternatively for a Stay Pending Appeal.

3. Every nominating petition sheet must be signed by a petition circulator, who must be at least 18 years of age and a citizen of the United States. The petition sheet includes a Certificate of Circulator and warning statement required by Mich. Comp. Laws, § 168.544c(1), in which the circulator certifies that he or she personally witnessed each voter sign the petition, did not knowingly cause or permit a person to sign the petition multiple times, believes all voter signatures to be authentic, and each petition signer was a registered elector and qualified to sign the petition:

CERTIFICATE OF CIRCULATOR

The undersigned circulator of the above petition asserts that he or she is 18 years of age or older and a United States citizen; that each signature on the petition was signed in his or her presence; that he or she has neither caused nor permitted a person to sign the petition more than once and has no knowledge of a person signing the petition more than once; and that, to his or her best knowledge and belief, each signature is the genuine signature of the person purporting to sign the petition, the person signing the petition was at the time of signing a registered elector of the City or Township indicated preceding the signature, and the elector was qualified to sign the petition.

☐ If the circulator is not a resident of Michigan, the circulator shall make a cross [X] or check mark [✓] in the box provided, otherwise each signature on this petition sheet is invalid and the signatures will not be counted by a filing official. By making a cross or check mark in the box provided, the undersigned circulator asserts that he or she is not a resident of Michigan and agrees to accept the jurisdiction of this state for the purpose of any legal proceeding or hearing that concerns a petition sheet executed by the circulator and agrees that legal process served on the Secretary of State or a designated agent of the Secretary of State has the same effect as if personally served on the circulator.

WARNING - A CIRCULATOR KNOWINGLY MAKING A FALSE STATEMENT IN THE ABOVE CERTIFICATE, A PERSON NOT A CIRCULATOR WHO SIGNS AS A CIRCULATOR, OR A PERSON WHO SIGNS A NAME OTHER THAN HIS OR HER OWN AS CIRCULATOR IS GUILTY OF A MISDEMEANOR.

4. On April 21, 2020 at approximately 10:30 a.m., Plaintiff Eric Esshaki personally appeared at the offices of the Secretary of State's Bureau of Elections in Lansing, Michigan and filed 221 sheets of nominating petitions containing what he estimated to be 1,220 signatures for the office of U.S. Representative in Congress, 11th District, and his Affidavit of Identity.

5. Upon receipt of Plaintiff's filing, I personally reviewed all 221 petition sheets and observed the following:

Petition Circulation by Plaintiff or Others Related to Plaintiff After the Issuance of Executive Orders 2020-21 and 2020-42

a. Between April 11 and April 19, 2020, Plaintiff Esshaki personally circulated three nominating petition sheets and gathered 25 signatures from residents of Birmingham, Troy and West Bloomfield. (See Exhibit 1).

**CIRCULATOR — DO NOT SIGN OR DATE
CERTIFICATE UNTIL AFTER CIRCULATING PETITION.**


 (Signature of Circulator) _____ 4 / 17 / 20 _____
 (Date)
 Eric Esshaki
 (Printed Name of Circulator) _____
 1731 Hazel
 (Complete Residence Address [Street and Number or Rural Route]) - [Do not enter a post office box]
 Birmingham MI 48009
 (City or Township, State, Zip Code) _____

 (County of Registration, if Registered to Vote, of a Circulator who is not a Resident of Michigan)

b. Between April 14 and April 20, 2020, a person appearing to be related to Plaintiff Esshaki circulated ten nominating petition sheets and gathered 95 signatures from residents of Birmingham, Bloomfield Hills, Bloomfield Township, Commerce Township and Troy in Oakland County and Canton Township, Livonia and Plymouth in Wayne County. (See Exhibit 1).

c. On April 19, 2020, a different person appearing to be related to Plaintiff circulated one nominating petition sheet that included 8 signatures from residents of Wixom and Highland Township. (See Exhibit 1.)

Petition Circulation by Others

After the Issuance of Executive Orders 2020-21 and 2020-42

d. Thirteen other individuals circulated Plaintiff's nominating petition sheets between April 9 and April 19, 2020. In total, these

circulators gathered approximately 114 signatures from residents of 16 Southeast Michigan communities that lie within the 11th Congressional District, including Birmingham, Bloomfield Township, Clawson, Commerce Township, Highland Township, Milford, Novi, South Lyon, Troy, Waterford, West Bloomfield, White Lake Township, Wixom in Oakland County and Canton Township, Livonia and Plymouth in Wayne County. (See Exhibit 2).

e. In total, 242 voters signed petition sheets circulated by sixteen different individuals as described in ¶¶ (5)(a)-(d) above, after Governor Whitmer signed Executive Orders 2020-21 and 2020-42, the Stay-at-Home Orders.

Petition Circulation by Mail
After the Issuance of Executive Orders 2020-21 and 2020-42

f. On information and belief, Plaintiff received approximately 124 petition sheets in response to a solicitation by mail for additional signatures. These mailed-in petition sheets differ from other nominating petitions filed by Plaintiff in the following respects:

- i. Every circulator of a mailed-in petition sheet also signed the same petition sheet.
 - ii. The petition sheets usually contain 1-2 signatures of individuals residing at the same address, but some include the signatures of up to 4 individuals residing in the same household.
 - iii. Unlike any of the other petition sheets filed by Plaintiff, these sheets are creased with a double-parallel fold for ease of mailing.
- g. These mailed-in petition sheets contain approximately 228 signatures gathered between April 7 and April 19, 2020.

Petition Circulation Prior to Executive Orders
2020-21 and 2020-42

- h. Prior to March 13, 2020, Plaintiff's campaign gathered approximately 793 signatures on 69 nominating petition sheets.
- (Note: The March 13th date refers to the last date of signing indicated by a petition signer prior to the issuance of Executive Order 2020-21, not the date on which the petition circulator executed the Certificate of Circulator.)

6. Plaintiff did not avail himself of the relief provided by the Court in its April 20, 2020, Order Granting Motion for Preliminary Injunction (Doc. 23):

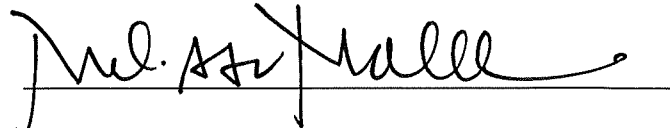
a. Plaintiff filed his nominating petitions in advance of the April 21, 2020, 4:00 p.m. statutory filing deadline as opposed to the extended deadline ordered by the Court, which will elapse on May 8, 2020. at 5:00 p.m. Mich. Comp. Laws, § 168.133.

b. Plaintiff filed approximately 1,263 signatures, more than 25% (or 263 signatures) over the minimum number of signatures required by statute, far in excess of the 50% reduction in the minimum signature threshold (or 500 signatures) ordered by the Court. Mich. Comp. Laws, § 168.544f.

7. Although Plaintiff has filed his nominating petition, he may supplement this filing with additional signatures until the extended filing deadline expires at 5:00 p.m. on May 8, 2020, under the terms of the Court's Order. This is because unlike ballot proposals, *see* Mich. Comp. Laws, § 168.475(2), candidates are not prohibited from

supplementing their filings so long as their initial filing facially contains sufficient signatures to meet the filing threshold.

8. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 4/22/2020 
Melissa Malerman

INSTRUCTIONS ON REVERSE SIDE

NOMINATING PETITION

(COUNTYWIDE PARTISAN)

* The "Countywide" Partisan Petition form may be used by any partisan candidate. Exception: the form may not be used by a partisan candidate who seeks the office of County Commissioner; such candidates must use the "City/Township" Partisan Petition form.

We, the undersigned, registered and qualified voters of the County of Oakland, and State of Michigan, nominate Eric Esshaki, 1731 Hazel St.
 (Name of Candidate) (Street Address or Rural Route)
Birmingham, as a candidate of the Republican Party for the office of * Representative in Congress, 11th
 (City or Township) (Title of Office/Term Expiration Date) (District, if Any)
 to be voted for at the Primary Election to be held on the 4th day of August, 20 20.

WARNING - A PERSON WHO KNOWINGLY SIGNS MORE PETITIONS FOR THE SAME OFFICE THAN THERE ARE PERSONS TO BE ELECTED TO THE OFFICE, SIGNS A PETITION MORE THAN ONCE, OR SIGNS A NAME OTHER THAN HIS OR HER OWN IS VIOLATING THE PROVISIONS OF THE MICHIGAN ELECTION LAW.

Indicate City or Township in Which Registered to Vote	Signature	Printed Name	Street Address or Rural Route	Zip Code	DATE OF SIGNING		
					Month	Day	Year
CITY OF TOWNSHIP OF ☒ Birmingham	1. <u>Chris Culpepper</u>	<u>Chris Culpepper</u>	<u>701 E. Lincoln Birmingham</u>	<u>48009</u>	<u>07</u>	<u>11</u>	<u>20</u>
CITY OF TOWNSHIP OF ☒ Troy	2. <u>Jamie Parsons</u>	<u>Jamie Parsons</u>	<u>4768 Orchard Ridge Dr</u>	<u>48078</u>	<u>07</u>	<u>11</u>	<u>20</u>
CITY OF TOWNSHIP OF ☒ Bloomfield Hills	3. <u>Andrew Parsons</u>	<u>Andrew Parsons</u>	<u>102 S. Lincoln by the Green</u>	<u>48304</u>	<u>07</u>	<u>11</u>	<u>20</u>
CITY OF TOWNSHIP OF ☒ West Bloomfield	4. <u>Kyle Hannawa</u>	<u>Kyle Hannawa</u>	<u>2329 Deierman DR West Bloomfield</u>	<u>48324</u>	<u>07</u>	<u>11</u>	<u>20</u>
CITY OF TOWNSHIP OF ☒ Birmingham	5. <u>Sam Owens</u>	<u>Sam Owens</u>	<u>1598 E. Maple</u>	<u>48009</u>	<u>07</u>	<u>11</u>	<u>20</u>
CITY OF TOWNSHIP OF ☒ Birmingham	6. <u>Dillon Y. Davis</u>	<u>Dillon Y. Davis</u>	<u>3071 W. 11th St. B'ham 48007</u>	<u>48007</u>	<u>07</u>	<u>11</u>	<u>20</u>
CITY OF TOWNSHIP OF ☒ Birmingham	7. <u>Will Robinson</u>	<u>Will Robinson</u>	<u>944 Abbey</u>	<u>48009</u>	<u>07</u>	<u>11</u>	<u>20</u>
CITY OF TOWNSHIP OF ☒ Birmingham	8. <u>Dan Barlow</u>	<u>Dan Barlow</u>	<u>1355 Haynes</u>	<u>48009</u>	<u>07</u>	<u>11</u>	<u>20</u>
CITY OF TOWNSHIP OF ☒ Troy	9. <u>Josh Turkin</u>	<u>Josh Turkin</u>	<u>1021 Norwich Dr.</u>	<u>48064</u>	<u>07</u>	<u>11</u>	<u>20</u>
CITY OF TOWNSHIP OF ☒ West Bloomfield	10. <u>Michelle Heilmann</u>	<u>Michelle Heilmann</u>	<u>956 Forest Ave</u>	<u>48009</u>	<u>07</u>	<u>11</u>	<u>20</u>
CITY OF TOWNSHIP OF ☒ Birmingham	11. <u>Steve Joobers</u>	<u>Steve Joobers</u>	<u>967 Riverdale St</u>	<u>48009</u>	<u>07</u>	<u>11</u>	<u>20</u>
CITY OF TOWNSHIP OF ☒ Birmingham	12. <u>Maureen Heilmann</u>	<u>Maureen Heilmann</u>	<u>956 Forest Ave</u>	<u>48009</u>	<u>07</u>	<u>11</u>	<u>20</u>
CITY OF TOWNSHIP OF ☒ West Bloomfield	13. <u>Andrew Kass-Margi</u>	<u>Andrew Kass-Margi</u>	<u>1701 Bungalow St</u>	<u>48324</u>	<u>07</u>	<u>11</u>	<u>20</u>
CITY OF TOWNSHIP OF ☒ West Bloomfield	14. <u>Eric Parsons</u>	<u>Eric Parsons</u>	<u>25014 W. Lincoln</u>	<u>48304</u>	<u>07</u>	<u>11</u>	<u>20</u>

CERTIFICATE OF CIRCULATOR

The undersigned circulator of the above petition asserts that he or she is 18 years of age or older and a United States citizen; that each signature on the petition was signed in his or her presence; that he or she has neither caused nor permitted a person to sign the petition more than once and has no knowledge of a person signing the petition more than once; and that, to his or her best knowledge and belief, each signature is the genuine signature of the person purporting to sign the petition, the person signing the petition was at the time of signing a registered elector of the City or Township indicated preceding the signature, and the elector was qualified to sign the petition.

☐ If the circulator is not a resident of Michigan, the circulator shall make a cross [X] or check mark [v] in the box provided, otherwise each signature on this petition sheet is invalid and the signatures will not be counted by a filing official. By making a cross or check mark in the box provided, the undersigned circulator asserts that he or she is not a resident of Michigan and agrees to accept the jurisdiction of this state for the purpose of any legal proceeding or hearing that concerns a petition sheet executed by the circulator and agrees that legal process served on the Secretary of State or a designated agent of the Secretary of State has the same effect as if personally served on the circulator.

WARNING - A CIRCULATOR KNOWINGLY MAKING A FALSE STATEMENT IN THE ABOVE CERTIFICATE, A PERSON NOT A CIRCULATOR WHO SIGNS AS A CIRCULATOR, OR A PERSON WHO SIGNS A NAME OTHER THAN HIS OR HER OWN AS CIRCULATOR IS GUILTY OF A MISDEMEANOR.

CIRCULATOR — DO NOT SIGN OR DATE CERTIFICATE UNTIL AFTER CIRCULATING PETITION.

(Signature of Circulator)

Eric Esshaki

(Printed Name of Circulator)

1731 Hazel

(Complete Residence Address [Street and Number or Rural Route]) - [Do not enter a post office box]

Birmingham MI 48009

(City or Township, State, Zip Code)

(County of Registration, If Registered to Vote, of a Circulator who is not a Resident of Michigan)

NOMINATING PETITION
(COUNTYWIDE PARTISAN)

* The "Countywide" Partisan Petition form may be used by any partisan candidate.
Exception: the form may not be used by a partisan candidate who seeks the office of County Commissioner; such candidates must use the "City/Township" Partisan Petition form.

We, the undersigned, registered and qualified voters of the County of Oakland, and State of Michigan, nominate Eric Esshaki, 1731 Hazel St.
Birmingham, as a candidate of the Republican Party for the office of * Representative in Congress, 11th
to be voted for at the Primary Election to be held on the 4th day of August, 2020.

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Table with 6 columns: Indicate City or Township in Which Registered to Vote, Signature, Printed Name, Street Address or Rural Route, Zip Code, DATE OF SIGNING (Month, Day, Year). Contains 14 rows of handwritten signatures and names.

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CIRCULATOR — DO NOT SIGN OR DATE CERTIFICATE UNTIL AFTER CIRCULATING PETITION.
[Signature]
Eric Esshaki
1731 Hazel
Birmingham MI 48009

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INSTRUCTIONS ON REVERSE SIDE

NOMINATING PETITION
(COUNTYWIDE PARTISAN)

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We, the undersigned, registered and qualified voters of the County of Oakland, and State of Michigan, nominate Eric Esshaki, 1731 Hazel St.
(Name of Candidate) (Street Address or Rural Route)
Birmingham, as a candidate of the Republican Party for the office of * Representative in Congress, 11th
(City or Township) (Title of Office/Term Expiration Date) (District, if Any)
to be voted for at the Primary Election to be held on the 4th day of August, 20 20.

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Indicate City or Township in Which Registered to Vote	Signature	Printed Name	Street Address or Rural Route	Zip Code	DATE OF SIGNING		
					Month	Day	Year
CITY OF TOWNSHIP OF ☒ Troy	1.	R. M. Peluso	2824 Cedar Ridge	48084	04	19	2020
CITY OF TOWNSHIP OF ☒ Troy	2.	Elizabeth Wall	2904 Cedar Ridge Dr	48084	04	19	2020
CITY OF TOWNSHIP OF ☒ TROY	3.	Bill Wall	2904 Cedar Ridge Dr	48084	4	19	20
CITY OF TOWNSHIP OF ☒ Troy	4.	Brian Wall	2904 Cedar Ridge Dr	48084	4	19	2020
CITY OF TOWNSHIP OF ☒ TROY	5.	Todor Kuzmanov	3304 Witherbee Dr	48084	4	19	20
CITY OF TOWNSHIP OF ☒ TROY	6.	Cynthia Kuzmanov	3304 Witherbee Dr	48084	4	19	20
CITY OF TOWNSHIP OF ☒ Birmingham	7.	Katherine Yulo	1972 Pembroke Rd	48069	4	19	20
CITY OF TOWNSHIP OF ☒ Troy	8.	Peter Karanis	3450 Essex Dr	48084	4	19	20
CITY OF TOWNSHIP OF ☒ Birmingham	9.	Tim Cariswood	2344 WINDERMERE RD	48008	4	19	20
CITY OF TOWNSHIP OF ☒ TROY	10.	Molly Smith	1216 Wrenwood Dr	48084	4	20	20
CITY OF TOWNSHIP OF ☒ Birmingham	11.	Kevin Muir	2280 Dorechester	48009	4	20	20
CITY OF TOWNSHIP OF ☒ Birmingham	12.	John Price	704 Graefield	48009	4	20	20
CITY OF TOWNSHIP OF ☒ Birmingham	13.	Julia Bochniak	451 N Eton Street	48009	4	20	20
CITY OF TOWNSHIP OF ☒ Birmingham	14.	Andrei Broyce	451 N Eton Street	48009	4	20	20

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CIRCULATOR — DO NOT SIGN OR DATE
CERTIFICATE UNTIL AFTER CIRCULATING PETITION.

(Signature of Circulator) 4/20/20
(Date)
Heather Esshaki
(Printed Name of Circulator)
1731 Hazel
(Complete Residence Address [Street and Number or Rural Route]) - (Do not enter a post office box)
Birmingham, MI 48009
(City or Township, State, Zip Code)

(County of Registration, if Registered to Vote, of a Circulator who is not a Resident of Michigan)

INSTRUCTIONS ON REVERSE SIDE

NOMINATING PETITION
(COUNTYWIDE PARTISAN)

* The "Countywide" Partisan Petition form may be used by any partisan candidate.
Exception: the form may not be used by a partisan candidate who seeks the office of County Commissioner; such candidates must use the "City/Township" Partisan Petition form.

We, the undersigned, registered and qualified voters of the County of Wayne, and State of Michigan, nominate Eric Esshaki, 1731 Hazel St.
Birmingham, as a candidate of the Republican Party for the office of * Representative in Congress, 11th
(City or Township) (Title of Office/Term Expiration Date) (District, if Any)
to be voted for at the Primary Election to be held on the 4th day of August, 20 20

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Indicate City or Township in Which Registered to Vote	Signature	Printed Name	Street Address or Rural Route	Zip Code	DATE OF SIGNING		
					Month	Day	Year
CITY OF ☒ Livonia	1. <u>[Signature]</u>	<u>Whith A Beaupre</u>	<u>32919 6 mile RD</u>	<u>48152</u>	<u>04</u>	<u>19</u>	<u>20</u>
CITY OF ☒ Livonia	2. <u>[Signature]</u>	<u>Angela Kelley</u>	<u>36282 Northfield Ave.</u>	<u>48150</u>	<u>04</u>	<u>19</u>	<u>20</u>
CITY OF ☒ Livonia	3. <u>[Signature]</u>	<u>Cheryl Munro</u>	<u>36450 Northfield Ave</u>	<u>48150</u>	<u>04</u>	<u>19</u>	<u>20</u>
CITY OF ☒ Livonia	4. <u>[Signature]</u>	<u>STEVEN W MUNRO</u>	<u>36450 NORTHFIELD AVE</u>	<u>48150</u>	<u>04</u>	<u>19</u>	<u>20</u>
CITY OF ☒ Canton	5. <u>[Signature]</u>	<u>Nich Amad</u>	<u>3479 Wall St</u>	<u>48188</u>	<u>04</u>	<u>19</u>	<u>20</u>
CITY OF ☒ Canton	6. <u>[Signature]</u>	<u>Amanda Wohlfel</u>	<u>3479 Wall St.</u>	<u>48188</u>	<u>04</u>	<u>19</u>	<u>20</u>
CITY OF ☒ Canton	7. <u>[Signature]</u>	<u>APRIL ZUK</u>	<u>2561 WOODMONT DR E</u>	<u>48188</u>	<u>04</u>	<u>19</u>	<u>20</u>
CITY OF ☒ Canton	8. <u>[Signature]</u>	<u>STEVEN JACKSON</u>	<u>2561 WOODMONT DRE</u>	<u>48188</u>	<u>04</u>	<u>19</u>	<u>20</u>
CITY OF ☒ Canton	9. <u>[Signature]</u>	<u>Briana Spears</u>	<u>43662 aubor cx</u>	<u>48188</u>	<u>04</u>	<u>19</u>	<u>20</u>
CITY OF ☒ Livonia	10. <u>[Signature]</u>	<u>WILLIAM MANCINI</u>	<u>8914 BUTWELL</u>	<u>48150</u>	<u>4</u>	<u>19</u>	<u>20</u>
CITY OF ☒ Livonia	11. <u>[Signature]</u>	<u>Amber Firman</u>	<u>37127 Mallory Dr</u>	<u>48154</u>	<u>4</u>	<u>19</u>	<u>20</u>
CITY OF ☒ Livonia	12. <u>[Signature]</u>	<u>Greg Firman</u>	<u>37127 Mallory dr</u>	<u>48154</u>	<u>4</u>	<u>19</u>	<u>20</u>
CITY OF ☒ Livonia	13. <u>[Signature]</u>	<u>Antley mady</u>	<u>18919 milburn st</u>	<u>48152</u>	<u>4</u>	<u>19</u>	<u>20</u>
CITY OF ☒ Livonia	14. <u>[Signature]</u>	<u>Stephan Mady</u>	<u>18919 Milburn</u>	<u>48152</u>	<u>4</u>	<u>19</u>	<u>20</u>

CERTIFICATE OF CIRCULATOR

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CIRCULATOR — DO NOT SIGN OR DATE
CERTIFICATE UNTIL AFTER CIRCULATING PETITION.

[Signature] 4 19 20
(Signature of Circulator) (Date)
Heather Esshaki
(Printed Name of Circulator)
1731 Hazel
(Complete Residence Address (Street and Number or Rural Route)) - [Do not enter a post office box]
Birmingham, MI 48009
(City or Township, State, Zip Code)

(County of Registration, if Registered to Vote, of a Circulator who is not a Resident of Michigan)

NOMINATING PETITION
(COUNTYWIDE PARTISAN)

* The "Countywide" Partisan Petition form may be used by any partisan candidate.
Exception: the form may not be used by a partisan candidate who seeks the office of County Commissioner; such candidates must use the "City/Township" Partisan Petition form.

We, the undersigned, registered and qualified voters of the County of Oakland, and State of Michigan, nominate ERIC ESSHAKI, 1731 Hazel St.
Birmingham, as a candidate of the Republican Party for the office of * Representative in Congress, 11th
to be voted for at the Primary Election to be held on the 4th day of August, 2020.

WARNING - A PERSON WHO KNOWINGLY SIGNS MORE PETITIONS FOR THE SAME OFFICE THAN THERE ARE PERSONS TO BE ELECTED TO THE OFFICE, SIGNS A PETITION MORE THAN ONCE, OR SIGNS A NAME OTHER THAN HIS OR HER OWN IS VIOLATING THE PROVISIONS OF THE MICHIGAN ELECTION LAW.

Table with 7 columns: Indicate City or Township in Which Registered to Vote, Signature, Printed Name, Street Address or Rural Route, Zip Code, DATE OF SIGNING (Month, Day, Year). Contains 14 rows of handwritten signatures and names.

CERTIFICATE OF CIRCULATOR
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CIRCULATOR — DO NOT SIGN OR DATE
CERTIFICATE UNTIL AFTER CIRCULATING PETITION.
Heather Esshaki, 1731 Hazel
Birmingham, MI 48009
(Printed Name of Circulator) (City or Township, State, Zip Code)

INSTRUCTIONS ON REVERSE SIDE

NOMINATING PETITION

(COUNTYWIDE PARTISAN)

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Exception: the form may not be used by a partisan candidate who seeks the office of County Commissioner; such candidates must use the "City/Township" Partisan Petition form.

We, the undersigned, registered and qualified voters of the County of Cookland, and State of Michigan, nominate Eric Esshaki, 1731 Hazel St.
(Name of Candidate) (Street Address or Rural Route)
Birmingham, as a candidate of the Republican Party for the office of * Representative in Congress, 11th
(City or Township) (Title of Office/Term Expiration Date) (District, if Any)
to be voted for at the Primary Election to be held on the 4th day of August, 20 20.

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Indicate City or Township in Which Registered to Vote	Signature	Printed Name	Street Address or Rural Route	Zip Code	DATE OF SIGNING		
					Month	Day	Year
CITY OF <u>Birmingham</u>	[Signature]	[Name]	[Address]	[Zip]	07	17	20
CITY OF ☒ <u>Birmingham</u>	2. <u>[Signature]</u>	Nicole Abbo	1804 Banbury St. Birmingham MI	48009	4	17	20
TOWNSHIP OF ☒ <u>Birmingham</u>	3. <u>[Signature]</u>	Doug Cubbin	1617 Penistone St	48009	4	17	20
CITY OF ☒ <u>Birmingham</u>	4. <u>[Signature]</u>	Matt Wilson	4922 Waldon Woods	48382	4	18	20
TOWNSHIP OF ☒ <u>Commerce</u>	5. <u>[Signature]</u>	Elizabeth Wilson	4922 Waldon Woods	48382	4	18	20
CITY OF ☒ <u>Commerce</u>	6. <u>[Signature]</u>	Amanda Rehm	4799 Greenview Ct	48382	4	18	20
TOWNSHIP OF ☒ <u>Commerce</u>	7. <u>[Signature]</u>	Jeffrey Rehm	4799 Greenview Ct	48382	4	18	20
CITY OF ☒ <u>Commerce</u>	8. <u>[Signature]</u>	Nanette Muller	2371 Glenwood Ct	48382	4	18	20
TOWNSHIP OF ☒ <u>Commerce</u>	9. <u>[Signature]</u>	Richmond MILLER	2371 Glenwood Ct	48382	4	18	20
CITY OF ☒ <u>Commerce</u>	10. <u>[Signature]</u>	Olivia Muller	2371 Glenwood Ct	48382	4	18	20
TOWNSHIP OF ☒ <u>Commerce</u>	11. <u>[Signature]</u>	DAVID BEATTIE	2361 Glenwood Ct	48382	4	18	20
CITY OF ☒ <u>Commerce</u>	12. <u>[Signature]</u>	Janice Beattie	2361 Glenwood Ct.	48382	4	18	20
TOWNSHIP OF ☒ <u>Commerce</u>	13. <u>[Signature]</u>	Ryan Beattie	2361 Glenwood Ct	48382	4	18	20
CITY OF ☒ <u>Commerce</u>	14. <u>[Signature]</u>	LUDD VANDERLAAN	2350 Glenwood Ct.	48382	4	18	20

CERTIFICATE OF CIRCULATOR

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CIRCULATOR — DO NOT SIGN OR DATE CERTIFICATE UNTIL AFTER CIRCULATING PETITION.

[Signature] 4/18/20
(Signature of Circulator) (Date)
Heather Esshaki
(Printed Name of Circulator)
1731 Hazel
(Complete Residence Address [Street and Number or Rural Route]) - [Do not enter a post office box]
Birmingham, MI 48009
(City or Township, State, Zip Code)

(County of Registration, if Registered to Vote, of a Circulator who is not a Resident of Michigan)

INSTRUCTIONS ON REVERSE SIDE

NOMINATING PETITION
(COUNTYWIDE PARTISAN)

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We, the undersigned, registered and qualified voters of the County of Oakland, and State of Michigan, nominate Eric Esshaki, 1731 Hazel St.
(Name of Candidate) (Street Address or Rural Route)
Birmingham, as a candidate of the Republican Party for the office of * Representative in Congress, 11th
(City or Township) (Title of Office/Term Expiration Date) (District, if Any)
to be voted for at the Primary Election to be held on the 4th day of August, 20 20.

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Indicate City or Township in Which Registered to Vote	Signature	Printed Name	Street Address or Rural Route	Zip Code	DATE OF SIGNING		
					Month	Day	Year
CITY OF TOWNSHIP OF ☒ Birmingham	1.	EWA WILKINSON	1609 Graefing Rd	48003	04	14	2020
CITY OF TOWNSHIP OF ☒ Birmingham	2.	TONY TESSA	1474 VILLA	48001	4	14	2020
CITY OF TOWNSHIP OF ☒ Birmingham	3.	Jan Wright	25464 6015 Shiner	48007	4	14	2020
CITY OF TOWNSHIP OF ☒ Birmingham	4.	John Thompson	4080 WIL	48009	4	14	2020
CITY OF TOWNSHIP OF ☒ Birmingham	5.	Virginia French	5203 Manchester	48009	4	14	2020
CITY OF TOWNSHIP OF ☒ Birmingham Hills	6.	John Cookley	1525 Cole Street, Walled Lake	48009	4	14	2020
CITY OF TOWNSHIP OF ☒ Birmingham	7.	Will Fume	1700 Cole St	48009	4	14	2020
CITY OF TOWNSHIP OF ☒ Birmingham	8.	Tom Ashcraft	2439 Backus	48007	4	14	2020
CITY OF TOWNSHIP OF ☒ Troy	9.	John Benedict	4617 Valley View Ln Troy	48062	4	14	2020
CITY OF TOWNSHIP OF ☒ Troy	10.	Nicholas Murphy	3650 W Big Beaver Troy	48065	4	14	2020
CITY OF TOWNSHIP OF ☒ Bloomfield Hills	11.	John Dahlstedt	2432 Hickory Glen Dr	48304	4	14	2020
CITY OF TOWNSHIP OF ☒ Bloomfield Hills	12.	CHARLES P BARNES	1080 Rockspring	48304	4	14	2020
CITY OF TOWNSHIP OF ☒ Birmingham	14.	Jan Gordon	1906 Graefing	48009	4	14	2020

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CIRCULATOR — DO NOT SIGN OR DATE
CERTIFICATE UNTIL AFTER CIRCULATING PETITION.

(Signature of Circulator) 4/15/20
(Date)
Heather Esshaki
(Printed Name of Circulator)
1731 Hazel
(Complete Residence Address [Street and Number or Rural Route]) - [Do not enter a post office box]
Birmingham, MI 48009
(City or Township, State, Zip Code)

(County of Registration, if Registered to Vote, of a Circulator who is not a Resident of Michigan)



NOMINATING PETITION

(COUNTYWIDE PARTISAN)

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Indicate City or Township in Which Registered to Vote	Signature	Printed Name	Street Address or Rural Route	Zip Code	DATE OF SIGNING		
					Month	Day	Year
CITY OF ☐ TOWNSHIP OF ☒ <u>CANTON</u>	<u>[Signature]</u>	<u>BRUCE C. PATTERSON</u>	<u>4247 RED FERN STREET</u>	<u>48187</u>	<u>04</u>	<u>19</u>	<u>20</u>
CITY OF ☐ TOWNSHIP OF ☒ <u>CANTON</u>	<u>[Signature]</u>	<u>PHYLLIS M. PATTERSON</u>	<u>42479 RED FERN STREET</u>	<u>48187</u>	<u>04</u>	<u>19</u>	<u>20</u>
CITY OF ☒ TOWNSHIP OF ☒ <u>LIVONIA</u>	<u>[Signature]</u>	<u>Rebecca Fields</u>	<u>11435 Mayfield St</u>	<u>48150</u>	<u>04</u>	<u>19</u>	<u>20</u>
CITY OF ☒ TOWNSHIP OF ☒ <u>LIVONIA</u>	<u>[Signature]</u>	<u>Garry Fields</u>	<u>11435 Mayfield St</u>	<u>48150</u>	<u>04</u>	<u>19</u>	<u>20</u>
CITY OF ☒ TOWNSHIP OF ☒ <u>LIVONIA</u>	<u>[Signature]</u>	<u>Megan Miller</u>	<u>11300 Mayfield St</u>	<u>48150</u>	<u>04</u>	<u>19</u>	<u>20</u>
CITY OF ☐ TOWNSHIP OF ☒ <u>Livonia</u>	<u>[Signature]</u>	<u>Nathan Miller</u>	<u>11300 Mayfield St</u>	<u>48150</u>	<u>04</u>	<u>19</u>	<u>20</u>
CITY OF ☒ TOWNSHIP OF ☒ <u>Plymouth</u>	<u>[Signature]</u>	<u>Felicia German</u>	<u>1410 Junction St</u>	<u>48170</u>	<u>04</u>	<u>19</u>	<u>20</u>
CITY OF ☒ TOWNSHIP OF ☒ <u>Livonia</u>	<u>[Signature]</u>	<u>Lisa A DiDomenico</u>	<u>36852 Kingsburn Dr</u>	<u>48152</u>	<u>04</u>	<u>19</u>	<u>20</u>
CITY OF ☒ TOWNSHIP OF ☒ <u>Livonia</u>	<u>[Signature]</u>	<u>Joseph G DiDomenico</u>	<u>36852 Kingsburn</u>	<u>48152</u>	<u>04</u>	<u>19</u>	<u>20</u>
CITY OF ☐ TOWNSHIP OF ☐	10.						
CITY OF ☐ TOWNSHIP OF ☐	11.						
CITY OF ☐ TOWNSHIP OF ☐	12.						
CITY OF ☐ TOWNSHIP OF ☐	13.						
CITY OF ☐ TOWNSHIP OF ☐	14.						

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CIRCULATOR — DO NOT SIGN OR DATE CERTIFICATE UNTIL AFTER CIRCULATING PETITION.

[Signature] 4/20/20
(Signature of Circulator) (Date)
Heather Esshaki
(Printed Name of Circulator)
1731 Hazel
(Complete Residence Address [Street and Number or Rural Route]) - [Do not enter a post office box]
Birmingham, MI 48009
(City or Township, State, Zip Code)

(County of Registration, if Registered to Vote, of a Circulator who is not a Resident of Michigan)

NOMINATING PETITION
(COUNTYWIDE PARTISAN)

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Indicate City or Township in Which Registered to Vote	Signature	Printed Name	Street Address or Rural Route	Zip Code	DATE OF SIGNING		
					Month	Day	Year
CITY OF TOWNSHIP OF ☒ Troy	1. <u>Allison Baker</u>	Allison Baker	1634 Witherbee	48084	4	18	20
CITY OF TOWNSHIP OF ☒ Troy	2. <u>Ben Alexander</u>	Ben Alexander	1634 Witherbee "	48084	4	18	20
CITY OF TOWNSHIP OF ☒ Troy	3. <u>Christen Koenigsknecht</u>	Christen Koenigsknecht	3463 Donatha Ct.	48084	4	18	20
CITY OF TOWNSHIP OF ☒ Troy	4. <u>Stacey Boegner</u>	Stacey Boegner	3062 Myddleton Ct	48084	4	18	20
CITY OF TOWNSHIP OF ☒ TROY	5. <u>Robert Crosby</u>	ROBERT CROSBY	2015 WINDMERE	48084	4	18	20
CITY OF TOWNSHIP OF ☒ Birmingham	7. <u>Marie Green</u>	Marie Green	2535 Yorkshire	48085	4	18	20
CITY OF TOWNSHIP OF ☒ Troy	8. <u>Douglas Tietz</u>	Douglas Tietz	5833 Bingham Dr.	48085	4	18	20
CITY OF TOWNSHIP OF ☒ Troy	9. <u>Amy Tietz</u>	Amy Tietz	5833 Bingham Dr	48085	4	18	20
CITY OF TOWNSHIP OF ☐	10.						
CITY OF TOWNSHIP OF ☐	11.						
CITY OF TOWNSHIP OF ☐	12.						
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Heather Esshaki 4/19/20
(Signature of Circulator) (Date)
Heather Esshaki
(Printed Name of Circulator)
1731 Hazel
(Complete Residence Address [Street and Number or Rural Route]) - [Do not enter a post office box]
Birmingham, AL 35209
(City or Township, State, Zip Code)

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NOMINATING PETITION
(COUNTYWIDE PARTISAN)

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Table with 6 columns: Indicate City or Township in Which Registered to Vote, Signature, Printed Name, Street Address or Rural Route, Zip Code, DATE OF SIGNING (Month, Day, Year). Rows include Christine Alverno, Thomas L. Stafford, Regina Talca, Kevin Talca, Michael McAuliffe, Barbara McAuliffe, and Hendrieka M. Bloom.

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Heather Esshaki, 1731 Hazel St., Birmingham, MI 48009
(Complete Residence Address [Street and Number or Rural Route]) - [Do not enter a post office box]

(County of Registration, if Registered to Vote, of a Circulator who is not a Resident of Michigan)

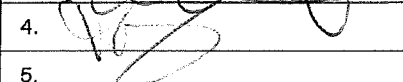
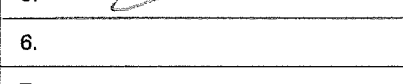
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Indicate City or Township in Which Registered to Vote	Signature	Printed Name	Street Address or Rural Route	Zip Code	DATE OF SIGNING		
					Month	Day	Year
CITY OF TOWNSHIP OF ☒ <u>Birmingham</u>		<u>LISA JABBARI</u>	<u>2895 Dorchester Rd.</u>	<u>48009</u>	<u>4</u>	<u>14</u>	<u>20</u>
CITY OF TOWNSHIP OF ☐ <u>[REDACTED]</u>		<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>
CITY OF TOWNSHIP OF ☐ <u>[REDACTED]</u>		<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>
CITY OF TOWNSHIP OF ☒ <u>Birmingham</u>		<u>David R. Wolf</u>	<u>987 Ridgely Ave</u>	<u>48009</u>	<u>4</u>	<u>14</u>	<u>20</u>
CITY OF TOWNSHIP OF ☐	5.						
CITY OF TOWNSHIP OF ☐	6.						
CITY OF TOWNSHIP OF ☐	7.						
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CITY OF TOWNSHIP OF ☐	9.						
CITY OF TOWNSHIP OF ☐	10.						
CITY OF TOWNSHIP OF ☐	11.						
CITY OF TOWNSHIP OF ☐	12.						
CITY OF TOWNSHIP OF ☐	13.						
CITY OF TOWNSHIP OF ☐	14.						

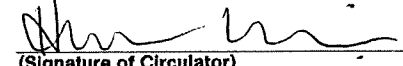
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CERTIFICATE UNTIL AFTER CIRCULATING PETITION.**


(Signature of Circulator) 4/17/20
(Date)
Heather Esshaki
(Printed Name of Circulator)
1731 Hazel
(Complete Residence Address [Street and Number or Rural Route]) - [Do not enter a post office box]
Birmingham, MI 48009
(City or Township, State, Zip Code)

(County of Registration, if Registered to Vote, of a Circulator who is not a Resident of Michigan)



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NOMINATING PETITION

(COUNTYWIDE PARTISAN)

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					Month	Day	Year
CITY OF TOWNSHIP OF ☒ <u>Plymouth</u>	1. <u>Lauren Azzopardi</u>	<u>Lauren Azzopardi</u>	<u>11393 Cedar Ln.</u>	<u>48170</u>	<u>4</u>	<u>17</u>	<u>20</u>
CITY OF TOWNSHIP OF ☒ <u>[REDACTED]</u>	2. <u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>
CITY OF TOWNSHIP OF ☒ <u>[REDACTED]</u>	3. <u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>
CITY OF TOWNSHIP OF ☒ <u>[REDACTED]</u>	4. <u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>
CITY OF TOWNSHIP OF ☒ <u>[REDACTED]</u>	5. <u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>
CITY OF TOWNSHIP OF ☐	6.						
CITY OF TOWNSHIP OF ☐	7.						
CITY OF TOWNSHIP OF ☐	8.						
CITY OF TOWNSHIP OF ☐	9.						
CITY OF TOWNSHIP OF ☐	10.						
CITY OF TOWNSHIP OF ☐	11.						
CITY OF TOWNSHIP OF ☐	12.						
CITY OF TOWNSHIP OF ☐	13.						
CITY OF TOWNSHIP OF ☐	14.						

CERTIFICATE OF CIRCULATOR

The undersigned circulator of the above petition asserts that he or she is 18 years of age or older and a United States citizen; that each signature on the petition was signed in his or her presence; that he or she has neither caused nor permitted a person to sign the petition more than once and has no knowledge of a person signing the petition more than once; and that, to his or her best knowledge and belief, each signature is the genuine signature of the person purporting to sign the petition, the person signing the petition was at the time of signing a registered elector of the City or Township indicated preceding the signature, and the elector was qualified to sign the petition.

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WARNING - A CIRCULATOR KNOWINGLY MAKING A FALSE STATEMENT IN THE ABOVE CERTIFICATE, A PERSON NOT A CIRCULATOR WHO SIGNS AS A CIRCULATOR, OR A PERSON WHO SIGNS A NAME OTHER THAN HIS OR HER OWN AS CIRCULATOR IS GUILTY OF A MISDEMEANOR.

CIRCULATOR — DO NOT SIGN OR DATE CERTIFICATE UNTIL AFTER CIRCULATING PETITION.

[Signature] 4/18/20
 (Signature of Circulator) (Date)
Heather Esshaki
 (Printed Name of Circulator)
1731 Hazel
 (Complete Residence Address [Street and Number or Rural Route]) - [Do not enter a post office box]
Birmingham, MI 48029
 (City or Township, State, Zip Code)

(County of Registration, If Registered to Vote, of a Circulator who is not a Resident of Michigan)



NOMINATING PETITION

(COUNTYWIDE PARTISAN)

* The "Countywide" Partisan Petition form may be used by any partisan candidate.
Exception: the form may not be used by a partisan candidate who seeks the office of County Commissioner; such candidates must use the "City/Township" Partisan Petition form.

We, the undersigned, registered and qualified voters of the County of Oakland, and State of Michigan, nominate Eric Esshaki, 1731 Hazel St.
(Name of Candidate) (Street Address or Rural Route)
Birmingham, as a candidate of the Republican Party for the office of * Representative in Congress, 11th
(City or Township) (Title of Office/Term Expiration Date) (District, if Any)
to be voted for at the Primary Election to be held on the 4th day of August, 20 20.

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Indicate City or Township in Which Registered to Vote	Signature	Printed Name	Street Address or Rural Route	Zip Code	DATE OF SIGNING		
					Month	Day	Year
CITY OF TOWNSHIP OF ☒ Commerce	1. <u>Jacob E. Dimick</u>	JACOB E. DIMICK	2425 Bevin Ct	48382	04	18	20
CITY OF TOWNSHIP OF ☒ Commerce	2. <u>Nichole Dimick</u>	Nichole Dimick	2425 Bevin Ct	48382	04	18	20
CITY OF TOWNSHIP OF ☒ Milford	3. <u>Jennifer Davis</u>	Jennifer Davis	534 Atlantic Milford	48381	04	18	20
CITY OF TOWNSHIP OF ☒ Milford	4. <u>Chad Davis</u>	Chad Davis	534 Atlantic Milford	48381	04	18	20
CITY OF TOWNSHIP OF ☒ Commerce	5. <u>Amy Beausoleil</u>	Amy Beausoleil	950 Listeria St	48382	04	18	20
CITY OF TOWNSHIP OF ☒ MILFORD	6. <u>John Zalucky</u>	JOHN ZALUCKY	3105 EXETER	48380	04	18	20
CITY OF TOWNSHIP OF ☒ Milford	7. <u>David Amayo</u>	David Amayo	626 Napa Valley	48381	04	19	20
CITY OF TOWNSHIP OF ☒ Milford	8. <u>Yasu Amayo</u>	Yasu Amayo	626 Napa Valley	48381	04	19	20
CITY OF TOWNSHIP OF ☒ Commerce	9. <u>Amber Antrobus</u>	Amber Antrobus	4758 Sunset	48382	04	19	20
CITY OF TOWNSHIP OF ☒ Commerce	10. <u>Kenny Berger</u>	Kenny Berger	4758 Sunset St.	48382	04	19	20
CITY OF TOWNSHIP OF ☒ Highland	11. <u>Megan Nickerson</u>	Megan Nickerson	572 Snyder Rd	48357	04	19	20
CITY OF TOWNSHIP OF ☒ White Lake	12. <u>Bret Wilson</u>	Bret Wilson	634 Plainfield Dr.	48386	04	19	20
CITY OF TOWNSHIP OF ☒ White Lake	13. <u>Dennis Wilson</u>	Dennis Wilson	634 Plainfield Dr	48386	04	19	20
CITY OF TOWNSHIP OF ☒ WHITE LAKE	14. <u>Cheryl Wilson</u>	CHERYL WILSON	634 PLAINFIELD DR	48386	04	19	20

CERTIFICATE OF CIRCULATOR

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CIRCULATOR — DO NOT SIGN OR DATE CERTIFICATE UNTIL AFTER CIRCULATING PETITION.

Elizabeth Ashley Wilson 4/20/20
(Signature of Circulator) (Date)
4422 Walden Woods Dr
(Printed Name of Circulator)
Commerce Twp, MI 48382
(Complete Residence Address (Street and Number or Rural Route)) - (Do not enter a post office box)
(City or Township, State, Zip Code)

(County of Registration, if Registered to Vote, of a Circulator who is not a Resident of Michigan)

INSTRUCTIONS ON REVERSE SIDE

NOMINATING PETITION

(COUNTYWIDE PARTISAN)

* The "Countywide" Partisan Petition form may be used by any partisan candidate. Exception: the form may not be used by a partisan candidate who seeks the office of County Commissioner; such candidates must use the "City/Township" Partisan Petition form.

We, the undersigned, registered and qualified voters of the County of OAKLAND, and State of Michigan, nominate Eric Esshaki, 1731 Hazel St.
 (Name of Candidate) (Street Address or Rural Route)
Birmingham, as a candidate of the Republican Party for the office of * Representative in Congress, 11th
 (City or Township) (Title of Office/Term Expiration Date) (District, if Any)
 to be voted for at the Primary Election to be held on the 4th day of August, 20 20.

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Indicate City or Township in Which Registered to Vote	Signature	Printed Name	Street Address or Rural Route	Zip Code	DATE OF SIGNING		
					Month	Day	Year
CITY OF ☒ TROY	1. Joyce A. Figlar	Joyce A. Figlar	480 Booth Rd. Troy, MI	48085	4	17	2020
TOWNSHIP OF ☒ TROY	2. David S. Figlar	David S. Figlar	480 Booth Rd Troy, MI	48085	4	17	2020
CITY OF ☒ TROY	3. Scott Philip Kennedy	Scott Philip Kennedy	153 Booth Rd Troy	48085	4	17	2020
TOWNSHIP OF ☒ TROY	4. Ann Marie Kennedy	Ann Marie Kennedy	153 Booth Rd Troy	48085	4	17	2020
CITY OF ☒ TROY	5. Bonnie L. Horne	Bonnie L. Horne	6729 Westaway, Troy	48085	4	17	2020
TOWNSHIP OF ☒ TROY	6. Joseph Horne	Joseph Horne	6729 Westaway, Troy	48085	4	17	2020
CITY OF ☒ TROY	7. Dorothy C. Hay	Dorothy C. Hay	6704 Redford Circle	48085	4	17	2020
TOWNSHIP OF ☒ TROY	8. Eileen S. Kruper	EILEEN S. KRUPER	1151 GLASER	48085	4	17	2020
CITY OF ☒ TROY	9. Marc A. Schreiber	Marc A. Schreiber	1249 GLASER	48085	4	18	2020
TOWNSHIP OF ☒ TROY	10. Raquel Schreiber	Raquel Schreiber	1249 Glaser Dr.	48085	4	18	2020
CITY OF ☒ TROY	11. Rami Sweidan	Rami Sweidan	1121 glaser Dr.	48085	4	19	2020
TOWNSHIP OF ☒ TROY	12. Stephen Adams	Stephen Adams	745 W. Square Lake Troy	48098	4	19	2020
CITY OF ☒ TROY	13. George P. Adams	George P. Adams	345 W. Square Lake	48098	4	19	2020
TOWNSHIP OF ☒ TROY	14. Mary Anne Klingensmith	Mary Anne Klingensmith	6808 Fredmoor Troy	48098	4	19	2020

CERTIFICATE OF CIRCULATOR

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CIRCULATOR — DO NOT SIGN OR DATE

CERTIFICATE UNTIL AFTER CIRCULATING PETITION.

EILEEN S. KRUPER 04/19/20
 (Signature of Circulator) (Date)
Eileen S. Kruper
 (Printed Name of Circulator)
1151 GLASER DRIVE
 (Complete Residence Address [Street and Number or Rural Route]) - [Do not enter a post office box]
TROY, MI 48085
 (City or Township, State, Zip Code)
OAKLAND
 (County of Registration, if Registered to Vote, of a Circulator who is not a Resident of Michigan)

INSTRUCTIONS ON REVERSE SIDE

NOMINATING PETITION
(COUNTYWIDE PARTISAN)

* The "Countywide" Partisan Petition form may be used by any partisan candidate.
Exception: the form may not be used by a partisan candidate who seeks the office of County Commissioner; such candidates must use the "City/Township" Partisan Petition form.

We, the undersigned, registered and qualified voters of the County of Oakland, and State of Michigan, nominate Eric Esshaki, 1731 Hazel St.
(Name of Candidate) (Street Address or Rural Route)
Birmingham, as a candidate of the Republican Party for the office of * Representative in Congress, 11th
(City or Township) (Title of Office/Term Expiration Date) (District, if Any)
to be voted for at the Primary Election to be held on the 4th day of August, 20 20.

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Indicate City or Township in Which Registered to Vote	Signature	Printed Name	Street Address or Rural Route	Zip Code	DATE OF SIGNING		
					Month	Day	Year
CITY OF ☐ Highland	1. <i>Valarie S. Anglemier</i>	Valarie S. Anglemier	2452 North St. Milford	48380	04	17	2020
TOWNSHIP OF ☒ Highland	2. <i>John R. Anglemier</i>	John R. Anglemier	2452 North St. Milford	48380	04	17	2020
CITY OF ☐ Highland	3. <i>John P. Aspinwall</i>	JOHN P. ASPINWALL	24201 CHESAPEAKE CIR	48390	04	17	2020
TOWNSHIP OF ☒ Commerce	4. <i>Tim S. Greenhalgh</i>	Tim S. Greenhalgh	21975 N LANTANA	48178	04	17	2020
CITY OF ☐ South Lyon	5. <i>Mike Brasseaux</i>	Mike Brasseaux	1571 Shaulen	48390	05	17	2020
TOWNSHIP OF ☒ Commerce	6. <i>David Lankford</i>	David Lankford	356 Rosario Lane White Lake	48386	4	17	2020
CITY OF ☐ White Lake	7. <i>Scott Karger</i>	Scott Karger	3638 Oakland Drive	48324	4	17	2020
TOWNSHIP OF ☒ West Bloomfield	8. <i>Kim Wacker</i>	KIM WACKER	1347 BRIARWOOD CT	48393	4	17	2020
CITY OF ☐ Wixom	9. <i>Ronald Locklear</i>	Ronald Locklear	1676 Lombardy	48356	4	17	2020
TOWNSHIP OF ☒ Highland	10. <i>Greg Campbell</i>	Greg Campbell	448 Burgess Dr	48386	4	17	2020
CITY OF ☐ White Lake	11. <i>Chris Rock</i>	Chris Rock	3576 Tara Dr.	48356	4	17	2020
TOWNSHIP OF ☒ Highland	12. <i>Blair Thompson</i>	Blair Thompson	8659 Lindsey Ln	48387	4	17	2020
CITY OF ☐ Canton	13. <i>Ray Kalosits</i>	RAY KALOSITS	405 Stead Field	48382	4	17	2020
TOWNSHIP OF ☒ Commerce	14. <i>Bryan Brakowski</i>	Bryan Brakowski	30033 Fairfield	48152	4	17	2020
CITY OF ☐ Livonia							

CERTIFICATE OF CIRCULATOR

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CIRCULATOR — DO NOT SIGN OR DATE
CERTIFICATE UNTIL AFTER CIRCULATING PETITION.

Valarie S. Anglemier 4 / 17 / 2020
(Signature of Circulator) (Date)
Valarie S. Anglemier
(Printed Name of Circulator)
2452 North St.
(Complete Residence Address [Street and Number or Rural Route]) - [Do not enter a post office box]
Milford, MI 48380
(City or Township, State, Zip Code)
Oakland
(County of Registration, if Registered to Vote, of a Circulator who is not a Resident of Michigan)

INSTRUCTIONS ON REVERSE SIDE

NOMINATING PETITION
(COUNTYWIDE PARTISAN)

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Exception: the form may not be used by a partisan candidate who seeks the office of County Commissioner; such candidates must use the "City/Township" Partisan Petition form.

We, the undersigned, registered and qualified voters of the County of Oakland, and State of Michigan, nominate Eric Esshaki,
(Name of Candidate)
1731 Hazel St.
(Street Address or Rural Route)
Birmingham, as a candidate of the Republican Party for the office of * Representative in Congress
(City or Township) (Title of Office/Term Expiration Date)
4th day of August, 20 20
(District, if Any)

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Indicate City or Township in Which Registered to Vote	Signature	Printed Name	Street Address or Rural Route	Zip Code	DATE OF SIGNING		
					Month	Day	Year
CITY OF TOWNSHIP OF ☒ <u>Novi</u>	1. <u>Camryn Lewis</u>	Camryn Lewis	23283 Ennishore Dr.	48375	4	17	20
CITY OF TOWNSHIP OF ☒ <u>Novi</u>	2. <u>Mary Beth Lewis</u>	Mary Beth Lewis	23283 Ennishore Dr.	48375	4	17	20
CITY OF TOWNSHIP OF ☒ <u>Novi</u>	3. <u>Edward P. Lewis</u>	Edward P. Lewis	23283 Ennishore Dr.	48375	4	17	20
CITY OF TOWNSHIP OF ☒ <u>CLAWSON</u>	4. <u>Emily Harvill</u>	Emily Harvill	1162 W. Elmwood	48017	4	18	20
CITY OF TOWNSHIP OF ☒ <u>CLAWSON</u>	5. <u>Matthew Harvill Jr</u>	Matthew Harvill Jr	1162 W. Elmwood	48017	4	18	20
CITY OF TOWNSHIP OF ☒ <u>CLAWSON</u>	6. <u>Vicki Harvill</u>	Vicki Harvill	1162 W. Elmwood	48017	4	18	20
CITY OF TOWNSHIP OF ☒ <u>CLAWSON</u>	7. <u>MATT HARVILL</u>	Matt Harvill	1162 W. Elmwood	48017	4	18	20
CITY OF TOWNSHIP OF ☒ <u>Troy</u>	8. <u>Rebecca Ignatowski</u>	Rebecca Ignatowski	6809 Serenity Dr.	48098	4	18	20
CITY OF TOWNSHIP OF ☒ <u>Troy</u>	9. <u>Matt Ignatowski</u>	Matt Ignatowski	6809 Serenity Dr.	48098	4	18	20
CITY OF TOWNSHIP OF ☒ <u>Troy</u>	10. <u>Kristen Purnford</u>	Kristen Purnford	3654 Wakefield Dr.	48083	4	18	20
CITY OF TOWNSHIP OF ☒ <u>Troy</u>	11. <u>Mollie Debandt</u>	Mollie Debandt	1251 Teagson	48083	4	18	20
CITY OF TOWNSHIP OF ☒ <u>Troy</u>	12. <u>Nick Purnford</u>	Nick Purnford	3654 Wakefield	48083	4	18	20
CITY OF TOWNSHIP OF ☒ <u>Troy</u>	13. <u>Bazil L. Hunt Jr</u>	BAZIL L. HUNT, JR	2478 WARWICK	48084	4	18	20
CITY OF TOWNSHIP OF ☐	14.						

CERTIFICATE OF CIRCULATOR

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CIRCULATOR — DO NOT SIGN OR DATE
CERTIFICATE UNTIL AFTER CIRCULATING PETITION.

Tara McKendrick 4/18/20
(Signature of Circulator) (Date)
Tara McKendrick
(Printed Name of Circulator)
2462 Warwick Drive
(Complete Residence Address [Street and Number or Rural Route]) - [Do not enter a post office box]
Troy, MI 48084
(City or Township, State, Zip Code)
Oakland
(County of Registration, if Registered to Vote, of a Circulator who is not a Resident of Michigan)

INSTRUCTIONS ON REVERSE SIDE

NOMINATING PETITION

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We, the undersigned, registered and qualified voters of the County of Oakland, and State of Michigan, nominate Eric Esshaki, 1731 Hazel St.
 (Name of Candidate) (Street Address or Rural Route)
Birmingham, as a candidate of the Republican Party for the office of * Representative in Congress, 11th
 (City or Township) (Title of Office/Term Expiration Date) (District, if Any)
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Indicate City or Township in Which Registered to Vote	Signature	Printed Name	Street Address or Rural Route	Zip Code	DATE OF SIGNING		
					Month	Day	Year
CITY OF TOWNSHIP OF ☒ Birmingham	1.	Jon Adams	1245 E. Lincoln Street	48009	4	11	2020
CITY OF TOWNSHIP OF ☒ BIRMINGHAM	2.	JOHN E SULLIVAN	866 HIDDEN RAVINES CT	48009	4	13	2020
CITY OF TOWNSHIP OF ☒ Troy	3.	TRICIA ALBERY	1651 ROCKFIELD DR	48085	4	15	2020
CITY OF TOWNSHIP OF ☒ TROY	4.	MICHAEL AMES	1661 ROCKFIELD DR	48085	4	15	2020
CITY OF TOWNSHIP OF ☒ TROY	5.	Rocco Mistrretta	1640 Rockfield Dr.	48085	4	15	2020
CITY OF TOWNSHIP OF ☒ TROY	6.	Julie Mistrretta	1640 Rockfield Dr.	48085	4	15	2020
CITY OF TOWNSHIP OF ☒ Troy	7.	Brett Albery	1551 Rockfield Dr.	48085	4	15	2020
CITY OF TOWNSHIP OF ☒ Troy	8.	AC SHAW	1628 Rockfield Dr.	48085	4	15	2020
CITY OF TOWNSHIP OF ☒ Troy	9.	KENNETH CRUM	1643 Rockfield Dr	48085	4	15	2020
CITY OF TOWNSHIP OF ☒ Troy	10.	Todd Albery	1651 Rockfield Dr.	48085	4	15	2020
CITY OF TOWNSHIP OF ☒ Bloomfield	11.	Angela Marcantonio	115 Hilltop Lane	48304	4	15	2020
CITY OF TOWNSHIP OF ☒ Bloomfield	12.	David Marcantonio	115 Hilltop Lane	48304	4	15	2020
CITY OF TOWNSHIP OF ☒ Birmingham	13.	Laura Duzan	668 S. Bates St	48009	4	18	2020
CITY OF TOWNSHIP OF ☒ Birmingham	14.	Jason Duzan	668 S. Bates St	48009	4	18	2020

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CIRCULATOR — DO NOT SIGN OR DATE CERTIFICATE UNTIL AFTER CIRCULATING PETITION.

(Signature of Circulator) 4 11 8 2020
 (Date)
Shelli Adams
 (Printed Name of Circulator)
1245 E Lincoln
 (Complete Residence Address [Street and Number or Rural Route]) - [Do not enter a post office box]
Birmingham, MI 48009
 (City or Township, State, Zip Code)
Oakland
 (County of Registration, if Registered to Vote, of a Circulator who is not a Resident of Michigan)

NOMINATING PETITION

(COUNTYWIDE PARTISAN)

* The "Countywide" Partisan Petition form may be used by any partisan candidate.
Exception: the form may not be used by a partisan candidate who seeks the office of County Commissioner; such candidates must use the "City/Township" Partisan Petition form.

We, the undersigned, registered and qualified voters of the County of Wayne, and State of Michigan, nominate Eric Esshaki, 1731 Hazel St.
(City or Township) (Name of Candidate) (Street Address or Rural Route)
Birmingham, as a candidate of the Republican Party for the office of * Representative in Congress, 11th
(City or Township) (Title of Office/Term Expiration Date) (District, if Any)
to be voted for at the Primary Election to be held on the 4th day of August, 20 20.

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Indicate City or Township in Which Registered to Vote	Signature	Printed Name	Street Address or Rural Route	Zip Code	DATE OF SIGNING		
					Month	Day	Year
CITY OF TOWNSHIP OF ☒ <u>PLYMOUTH</u>	1. <u>[Signature]</u>	<u>WARREN R. MUSSON</u>	<u>46565 W. ANN ARBOR TRAIL</u>	<u>48170</u>	<u>4</u>	<u>11</u>	<u>20</u>
CITY OF TOWNSHIP OF ☒ <u>PLYMOUTH</u>	2. <u>[Signature]</u>	<u>ANNE M. MUSSON</u>	<u>46565 W. ANN ARBOR TRAIL</u>	<u>48170</u>	<u>4</u>	<u>11</u>	<u>20</u>
CITY OF TOWNSHIP OF ☒ <u>PLYMOUTH</u>	3. <u>[Signature]</u>	<u>VICTORIA L. BENNETT</u>	<u>799 DEER COURT</u>	<u>48170</u>	<u>4</u>	<u>11</u>	<u>20</u>
CITY OF TOWNSHIP OF ☒ <u>PLYMOUTH</u>	4. <u>[Signature]</u>	<u>AMY BURNS</u>	<u>12007 TALLTREE</u>	<u>48170</u>	<u>4</u>	<u>11</u>	<u>20</u>
CITY OF TOWNSHIP OF ☒ <u>Plymouth</u>	5. <u>[Signature]</u>	<u>Stephen BURNS</u>	<u>12007 Tall Tree</u>	<u>48170</u>	<u>4</u>	<u>11</u>	<u>20</u>
CITY OF TOWNSHIP OF ☒ <u>Plymouth</u>	6. <u>[Signature]</u>	<u>Elizabeth PAWLUSZKA</u>	<u>12000 TALL TREE DR</u>	<u>48170</u>	<u>4</u>	<u>11</u>	<u>20</u>
CITY OF TOWNSHIP OF ☒ <u>PLYMOUTH</u>	7. <u>[Signature]</u>	<u>DEREK S. GRAHAM</u>	<u>1590 NANTUCKET RD</u>	<u>48170</u>	<u>4</u>	<u>13</u>	<u>20</u>
CITY OF TOWNSHIP OF ☒ <u>Plymouth</u>	8. <u>[Signature]</u>	<u>Karen Graham</u>	<u>1590 Nantucket Rd.</u>	<u>48170</u>	<u>4</u>	<u>13</u>	<u>20</u>
CITY OF TOWNSHIP OF ☒ <u>Plymouth</u>	9. <u>[Signature]</u>	<u>Walter Radgens</u>	<u>44445 Gov. Bradford Rd</u>	<u>48170</u>	<u>4</u>	<u>13</u>	<u>20</u>
CITY OF TOWNSHIP OF ☒ <u>Plymouth</u>	10. <u>[Signature]</u>	<u>Kim Radgens</u>	<u>44445 Gov. Bradford</u>	<u>48170</u>	<u>4</u>	<u>13</u>	<u>20</u>
CITY OF TOWNSHIP OF ☒ <u>Plymouth</u>	11. <u>[Signature]</u>	<u>THOMAS A. REDEK</u>	<u>327 DAISEY SQ PARKWAY</u>	<u>48170</u>	<u>4</u>	<u>13</u>	<u>20</u>
CITY OF TOWNSHIP OF ☒ <u>Plymouth</u>	12. <u>[Signature]</u>	<u>PATRICIA D. REDEK</u>	<u>327 Daisey Sq. PKwy</u>	<u>48170</u>	<u>4</u>	<u>13</u>	<u>20</u>
CITY OF TOWNSHIP OF ☒ <u>PLYMOUTH</u>	13. <u>[Signature]</u>	<u>PAUL FRANKHART</u>	<u>12360 PINECREST DR.</u>	<u>48170</u>	<u>4</u>	<u>13</u>	<u>20</u>
CITY OF TOWNSHIP OF ☐	14.						

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CIRCULATOR — DO NOT SIGN OR DATE CERTIFICATE UNTIL AFTER CIRCULATING PETITION.

[Signature] 4/14/20
(Signature of Circulator) (Date)
WARREN R. MUSSON
(Printed Name of Circulator)
46565 W-ANN ARBOR TRAIL
(Complete Residence Address [Street and Number or Rural Route]) - [Do not enter a post office box]
PLYMOUTH MICHIGAN 48170
(City or Township, State, Zip Code)

(County of Registration, if Registered to Vote, of a Circulator who is not a Resident of Michigan)



NOMINATING PETITION

(COUNTYWIDE PARTISAN)

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Exception: the form may not be used by a partisan candidate who seeks the office of County Commissioner; such candidates must use the "City/Township" Partisan Petition form.

We, the undersigned, registered and qualified voters of the County of Oakland, and State of Michigan, nominate

Eric Esshaki

1731 Hazel St.

Birmingham

Republican

Party for the office of *

Representative in Congress

(City or Township)

(Name of Candidate)

(Street Address or Rural Route)

11th

(Title of Office/Term Expiration Date)

(District, if Any)

to be voted for at the Primary Election to be held on the 4th day of August, 20 20

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Indicate City or Township in Which Registered to Vote	Signature	Printed Name	Street Address or Rural Route	Zip Code	DATE OF SIGNING		
					Month	Day	Year
CITY OF ☐ TOWNSHIP OF ☒ <u>White Lake Twp.</u>	1. <u>Douglas J. Sordyl</u>	DOUGLAS J. SORDYL	<u>3234 WALDON COVE</u>	<u>48383</u>	<u>04</u>	<u>09</u>	<u>20</u>
CITY OF ☐ TOWNSHIP OF ☒ <u>White Lake</u>	2. <u>Michael A. Kopczyk</u>	Michael A. Kopczyk	<u>3260 Waldon Cove</u>	<u>48383</u>	<u>4</u>	<u>12</u>	<u>20</u>
CITY OF ☐ TOWNSHIP OF ☒ <u>WHITE LAKE</u>	3. <u>Anne L. Sordyl</u>	ANNE L. SORDYL	<u>3234 WALDON COVE</u>	<u>48383</u>	<u>4</u>	<u>12</u>	<u>20</u>
CITY OF ☐ TOWNSHIP OF ☒ <u>Commerce</u>	4. <u>Barbara Hudspeth</u>	Barbara Hudspeth	<u>2771 Ivy Hill Dr</u>	<u>48382</u>	<u>4</u>	<u>13</u>	<u>20</u>
CITY OF ☐ TOWNSHIP OF ☒ <u>Commerce</u>	5. <u>Kaitlyn Hudspeth</u>	Kaitlyn Hudspeth	<u>2771 Ivy Hill Dr.</u>	<u>48382</u>	<u>4</u>	<u>13</u>	<u>2020</u>
CITY OF ☐ TOWNSHIP OF ☒ <u>COMMERCE</u>	6. <u>August J. LaRuffa</u>	AUGUST J. LARUFFA	<u>2119 APPLEBROOK</u>	<u>48382</u>	<u>04</u>	<u>13</u>	<u>2020</u>
CITY OF ☐ TOWNSHIP OF ☒ <u>commerce</u>	7. <u>Margaret M. LaRuffa</u>	Margaret M. LaRuffa	<u>2119 Applebrook Drive</u>	<u>48382</u>	<u>04</u>	<u>13</u>	<u>2020</u>
CITY OF ☐ TOWNSHIP OF ☒ <u>Commerce</u>	8. <u>Nancy Webb</u>	Nancy Webb	<u>4150 McAlpine Drive</u>	<u>48382</u>	<u>04</u>	<u>13</u>	<u>2020</u>
CITY OF ☐ TOWNSHIP OF ☒ <u>COMMERCE</u>	9. <u>Terrence Webb</u>	Terrence Webb	<u>4150 McAlpine Drive</u>	<u>48382</u>	<u>04</u>	<u>13</u>	<u>2020</u>
CITY OF ☐ TOWNSHIP OF ☐	10.						
CITY OF ☐ TOWNSHIP OF ☐	11.						
CITY OF ☐ TOWNSHIP OF ☐	12.						
CITY OF ☐ TOWNSHIP OF ☐	13.						
CITY OF ☐ TOWNSHIP OF ☐	14.						

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Douglas J. Sordyl 04/13/2020
(Signature of Circulator) (Date)
DOUGLAS J. SORDYL
(Printed Name of Circulator)
3234 WALDON COVE
(Complete Residence Address [Street and Number or Rural Route]) - [Do not enter a post office box]
WHITE LAKE TOWNSHIP, MI 48383
(City or Township, State, Zip Code)
OAKLAND
(County of Registration, if Registered to Vote, of a Circulator who is not a Resident of Michigan)



NOMINATING PETITION

(COUNTYWIDE PARTISAN)

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Exception: the form may not be used by a partisan candidate who seeks the office of County Commissioner; such candidates must use the "City/Township" Partisan Petition form.

We, the undersigned, registered and qualified voters of the County of Oakland, and State of Michigan, nominate Eric Esshaki, 1731 Hazel St.
(Name of Candidate) (Street Address or Rural Route)
Birmingham, as a candidate of the Republican Party for the office of * Representative in Congress, 11th
(City or Township) (Title of Office/Term Expiration Date) (District, if Any)
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CITY OF TOWNSHIP OF ☒ <u>Waterford</u>	1. <u>Karen Kay Pullins</u>	Karen Kay Pullins	500 Hillcliff Drive	48328	04	10	2020
CITY OF TOWNSHIP OF ☒ <u>Waterford</u>	2. <u>Barbara L. Edgley</u>	BARBARA L Edgley	960 Tecumseh Ave	48327	4	10	2020
CITY OF TOWNSHIP OF ☒ <u>Waterford</u>	3. <u>John Knapp</u>	JOHN Knapp	381 Corbetta Ln	48328	4	10	2020
CITY OF TOWNSHIP OF ☒ <u>Waterford</u>	4. <u>John Campbell</u>	John Campbell	555 Hillcliff Dr.	48328	4	10	2020
CITY OF TOWNSHIP OF ☒ <u>Waterford</u>	5. <u>Terri Salvador</u>	Terri Salvador	671 Hillcliff Dr.	48328	4	11	2020
CITY OF TOWNSHIP OF ☒ <u>Waterford</u>	6. <u>Joseph J. Saccaron</u>	Joseph J. Saccaron	671 Hillcliff Dr.	48328	4	11	2020
CITY OF TOWNSHIP OF ☒ <u>Waterford</u>	7. <u>David L. McGowan</u>	David L. McGowan	524 Hillcliff Drive	48328	4	11	2020
CITY OF TOWNSHIP OF ☒ <u>Waterford</u>	8. <u>Barbara A. Messick</u>	Barbara A. Messick	4083 Baybrook Dr.	48329	4	12	2020
CITY OF TOWNSHIP OF ☒ <u>Waterford</u>	9. <u>Kevin Laturneau</u>	Kevin Laturneau	96 Coleman Drive	48328	4	12	2020
CITY OF TOWNSHIP OF ☐	10.						
CITY OF TOWNSHIP OF ☐	11.						
CITY OF TOWNSHIP OF ☐	12.						
CITY OF TOWNSHIP OF ☐	13.						
CITY OF TOWNSHIP OF ☐	14.						

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CIRCULATOR — DO NOT SIGN OR DATE CERTIFICATE UNTIL AFTER CIRCULATING PETITION.

Karen Kay Pullins 04 11 2020
(Signature of Circulator) (Date)
Karen Kay Pullins
(Printed Name of Circulator)
500 Hillcliff Drive
(Complete Residence Address (Street and Number or Rural Route)) - [Do not enter a post office box]
Waterford, MI 48328-2518
(City or Township, State, Zip Code)

(County of Registration, if Registered to Vote, of a Circulator who is not a Resident of Michigan)

NOMINATING PETITION

(COUNTYWIDE PARTISAN)

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Exception: the form may not be used by a partisan candidate who seeks the office of County Commissioner; such candidates must use the "City/Township" Partisan Petition form.

We, the undersigned, registered and qualified voters of the County of Oakland, and State of Michigan, nominate Eric Esshaki, 1731 Hazel St.
(Name of Candidate) (Street Address or Rural Route)
Birmingham, as a candidate of the Republican Party for the office of * Representative in Congress, 11th
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					Month	Day	Year
CITY OF TOWNSHIP OF ☒ <u>CLAWSON</u>	1. <u>[Signature]</u>	<u>TIMOTHY E. Dow</u>	<u>486 Shenandoah Dr Clawson</u>	<u>48017</u>	<u>04</u>	<u>12</u>	<u>2020</u>
CITY OF TOWNSHIP OF ☒ <u>Troy</u>	2. <u>[Signature]</u>	<u>Christopher Dow</u>	<u>3446 Colwell Dr Troy</u>	<u>48083</u>	<u>04</u>	<u>17</u>	<u>2020</u>
CITY OF TOWNSHIP OF ☒ <u>Troy</u>	3. <u>[Signature]</u>	<u>Karen Dow</u>	<u>3446 Colwell Dr Troy</u>	<u>48083</u>	<u>04</u>	<u>17</u>	<u>2020</u>
CITY OF TOWNSHIP OF ☒ <u>Clawson</u>	4. <u>[Signature]</u>	<u>Michael Shurtz</u>	<u>327 Wilson Ave.</u>	<u>48017</u>	<u>04</u>	<u>17</u>	<u>2020</u>
CITY OF TOWNSHIP OF ☒ <u>Clawson</u>	5. <u>[Signature]</u>	<u>Hannah Shurtz</u>	<u>327 Wilson Ave. Clawson</u>	<u>48017</u>	<u>04</u>	<u>17</u>	<u>2020</u>
CITY OF TOWNSHIP OF ☒ <u>CLAWSON</u>	6. <u>[Signature]</u>	<u>Rebecca Crawford-Shurtz</u>	<u>327 Wilson Ave. Clawson</u>	<u>48017</u>	<u>04</u>	<u>17</u>	<u>2020</u>
CITY OF TOWNSHIP OF ☒ <u>Clawson</u>	7. <u>[Signature]</u>	<u>Rachel M. Dow</u>	<u>486 Shenandoah Dr</u>	<u>48017</u>	<u>04</u>	<u>18</u>	<u>2020</u>
CITY OF TOWNSHIP OF ☐	8.						
CITY OF TOWNSHIP OF ☐	9.						
CITY OF TOWNSHIP OF ☐	10.						
CITY OF TOWNSHIP OF ☐	11.						
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CIRCULATOR — DO NOT SIGN OR DATE CERTIFICATE UNTIL AFTER CIRCULATING PETITION.

[Signature] 4/18/2020
(Signature of Circulator) (Date)
Timothy E. Dow
(Printed Name of Circulator)
486 Shenandoah Dr
(Complete Residence Address [Street and Number or Rural Route]) - [Do not enter a post office box]
Clawson MI 48017
(City or Township, State, Zip Code)
Oakland
(County of Registration, if Registered to Vote, of a Circulator who is not a Resident of Michigan)

NOMINATING PETITION

(COUNTYWIDE PARTISAN)

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Indicate City or Township in Which Registered to Vote	Signature	Printed Name	Street Address or Rural Route	Zip Code	DATE OF SIGNING		
					Month	Day	Year
CITY OF TOWNSHIP OF ☒ <u>Canton</u>	1. <u>Deborah J Crocker</u>	<u>Deborah Crocker</u>	<u>2520 Oakham Ct, Canton</u>	<u>48188</u>	<u>04</u>	<u>10</u>	<u>20</u>
CITY OF TOWNSHIP OF ☒ <u>Canton</u>	2. <u>Jonathan A Crocker</u>	<u>Jonathan Crocker</u>	<u>2560 Oakham Ct Canton</u>	<u>48188</u>	<u>4</u>	<u>10</u>	<u>20</u>
CITY OF TOWNSHIP OF ☒ <u>CANTON</u>	3. <u>Hilda J Matzo</u>	<u>HILDA J. MATZO</u>	<u>7319 HAVERHILL CT, CANTON</u>	<u>48187</u>	<u>4</u>	<u>11</u>	<u>20</u>
CITY OF TOWNSHIP OF ☒ <u>CANTON</u>	4. <u>Augustin D Matzo</u>	<u>AUGUSTIN D. MATZO</u>	<u>7319 HAVERHILL CT, CANTON</u>	<u>48187</u>	<u>4</u>	<u>12</u>	<u>20</u>
CITY OF TOWNSHIP OF ☒ <u>VAN BUREN</u>	5. <u>Wesley Crocker</u>	<u>A. Wesley Crocker</u>	<u>6295 MONROE CT VAN BUREN TWP</u>	<u>48114</u>	<u>4</u>	<u>14</u>	<u>20</u>
CITY OF TOWNSHIP OF ☒ <u>VAN BUREN</u>	6. <u>Dan Crocker</u>	<u>Dan Crocker</u>	<u>6295 MONROE CT VAN BUREN TWP</u>	<u>48114</u>	<u>4</u>	<u>14</u>	<u>20</u>
CITY OF TOWNSHIP OF ☐	7.						
CITY OF TOWNSHIP OF ☐	8.						
CITY OF TOWNSHIP OF ☐	9.						
CITY OF TOWNSHIP OF ☐	10.						
CITY OF TOWNSHIP OF ☐	11.						
CITY OF TOWNSHIP OF ☐	12.						
CITY OF TOWNSHIP OF ☐	13.						
CITY OF TOWNSHIP OF ☐	14.						

CERTIFICATE OF CIRCULATOR

The undersigned circulator of the above petition asserts that he or she is 18 years of age or older and a United States citizen; that each signature on the petition was signed in his or her presence; that he or she has neither caused nor permitted a person to sign the petition more than once and has no knowledge of a person signing the petition more than once; and that, to his or her best knowledge and belief, each signature is the genuine signature of the person purporting to sign the petition, the person signing the petition was at the time of signing a registered elector of the City or Township indicated preceding the signature, and the elector was qualified to sign the petition.

☐ If the circulator is not a resident of Michigan, the circulator shall make a cross [X] or check mark [v] in the box provided, otherwise each signature on this petition sheet is invalid and the signatures will not be counted by a filing official. By making a cross or check mark in the box provided, the undersigned circulator asserts that he or she is not a resident of Michigan and agrees to accept the jurisdiction of this state for the purpose of any legal proceeding or hearing that concerns a petition sheet executed by the circulator and agrees that legal process served on the Secretary of State or a designated agent of the Secretary of State has the same effect as if personally served on the circulator.

WARNING - A CIRCULATOR KNOWINGLY MAKING A FALSE STATEMENT IN THE ABOVE CERTIFICATE, A PERSON NOT A CIRCULATOR WHO SIGNS AS A CIRCULATOR, OR A PERSON WHO SIGNS A NAME OTHER THAN HIS OR HER OWN AS CIRCULATOR IS GUILTY OF A MISDEMEANOR.

CIRCULATOR — DO NOT SIGN OR DATE CERTIFICATE UNTIL AFTER CIRCULATING PETITION.

Deborah J Crocker 4/14/20
(Signature of Circulator) (Date)
Deborah J Crocker
(Printed Name of Circulator)
2520 Oakham Ct
(Complete Residence Address [Street and Number or Rural Route]) - [Do not enter a post office box]
Canton Twp MI 48188
(City or Township, State, Zip Code)
Wayne County
(County of Registration, if Registered to Vote, of a Circulator who is not a Resident of Michigan)

INSTRUCTIONS ON REVERSE SIDE

NOMINATING PETITION
(COUNTYWIDE PARTISAN)

* The "Countywide" Partisan Petition form may be used by any partisan candidate.
Exception: the form may not be used by a partisan candidate who seeks the office of County Commissioner; such candidates must use the "City/Township" Partisan Petition form.

We, the undersigned, registered and qualified voters of the County of Wayne, and State of Michigan, nominate Eric Esshaki, 1731 Hazel St.
Birmingham, as a candidate of the Republican Party for the office of * Representative in Congress, 11th
(City or Township) (Title of Office/Term Expiration Date) (District, if Any)
to be voted for at the Primary Election to be held on the 4th day of August, 20 20

WARNING - A PERSON WHO KNOWINGLY SIGNS MORE PETITIONS FOR THE SAME OFFICE THAN THERE ARE PERSONS TO BE ELECTED TO THE OFFICE, SIGNS A PETITION MORE THAN ONCE, OR SIGNS A NAME OTHER THAN HIS OR HER OWN IS VIOLATING THE PROVISIONS OF THE MICHIGAN ELECTION LAW.

Indicate City or Township in Which Registered to Vote	Signature	Printed Name	Street Address or Rural Route	Zip Code	DATE OF SIGNING		
					Month	Day	Year
CITY OF TOWNSHIP OF ☒ <u>LIVONIA</u>	1. <u>[Signature]</u>	<u>DOROTHY KAY GOWEN</u>	<u>39022 LAPHAM</u>	<u>48154</u>	<u>4</u>	<u>13</u>	<u>2020</u>
CITY OF TOWNSHIP OF ☒ <u>Livonia</u>	2. <u>[Signature]</u>	<u>Donna Lee Anagnostou</u>	<u>14125 Cranston</u>	<u>48154</u>	<u>4</u>	<u>14</u>	<u>2020</u>
CITY OF TOWNSHIP OF ☒ <u>Livonia</u>	3. <u>[Signature]</u>	<u>Dawn Moore</u>	<u>16653 Park</u>	<u>48154</u>	<u>4</u>	<u>14</u>	<u>2020</u>
CITY OF TOWNSHIP OF ☐	4.						
CITY OF TOWNSHIP OF ☐	5.						
CITY OF TOWNSHIP OF ☐	6.						
CITY OF TOWNSHIP OF ☐	7.						
CITY OF TOWNSHIP OF ☐	8.						
CITY OF TOWNSHIP OF ☐	9.						
CITY OF TOWNSHIP OF ☐	10.						
CITY OF TOWNSHIP OF ☐	11.						
CITY OF TOWNSHIP OF ☐	12.						
CITY OF TOWNSHIP OF ☐	13.						
CITY OF TOWNSHIP OF ☐	14.						

CERTIFICATE OF CIRCULATOR

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CIRCULATOR — DO NOT SIGN OR DATE
CERTIFICATE UNTIL AFTER CIRCULATING PETITION.

[Signature] 04 11 2020
(Signature of Circulator) (Date)
DOROTHY KAY GOWEN
(Printed Name of Circulator)
39022 LAPHAM
(Complete Residence Address [Street and Number or Rural Route]) - [Do not enter a post office box]
LIVONIA MI 48154
(City or Township, State, Zip Code)
WAYNE
(County of Registration, if Registered to Vote, of a Circulator who is not a Resident of Michigan)

NOMINATING PETITION
(COUNTYWIDE PARTISAN)

* The "Countywide" Partisan Petition form may be used by any partisan candidate.
Exception: the form may not be used by a partisan candidate who seeks the office of County Commissioner; such candidates must use the "City/Township" Partisan Petition form.

We, the undersigned, registered and qualified voters of the County of Wayne, and State of Michigan, nominate Eric Esshaki, 1731 Hazel St.
Birmingham, as a candidate of the Republican Party for the office of Representative in Congress, 11th
to be voted for at the Primary Election to be held on the 4th day of August, 2020.

WARNING - A PERSON WHO KNOWINGLY SIGNS MORE PETITIONS FOR THE SAME OFFICE THAN THERE ARE PERSONS TO BE ELECTED TO THE OFFICE, SIGNS A PETITION MORE THAN ONCE, OR SIGNS A NAME OTHER THAN HIS OR HER OWN IS VIOLATING THE PROVISIONS OF THE MICHIGAN ELECTION LAW.

Table with 6 columns: Indicate City or Township in Which Registered to Vote, Signature, Printed Name, Street Address or Rural Route, Zip Code, DATE OF SIGNING (Month, Day, Year). Contains 14 rows of signatures and names.

CERTIFICATE OF CIRCULATOR

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CIRCULATOR — DO NOT SIGN OR DATE CERTIFICATE UNTIL AFTER CIRCULATING PETITION.

Signature of Circulator, Printed Name of Circulator, Complete Residence Address, City or Township, State, Zip Code, Date.

(County of Registration, If Registered to Vote, of a Circulator who is not a Resident of Michigan)

NOMINATING PETITION
(COUNTYWIDE PARTISAN)

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We, the undersigned, registered and qualified voters of the County of Oakland, and State of Michigan, nominate Eric Esshaki, 1731 Hazel St.
Birmingham, as a candidate of the Republican Party for the office of * Representative in Congress, 11th
(City or Township) (Title of Office/Term Expiration Date) (District, if Any)
to be voted for at the Primary Election to be held on the 4th day of August, 20 20.

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Indicate City or Township In Which Registered to Vote	Signature	Printed Name	Street Address or Rural Route	Zip Code	DATE OF SIGNING		
					Month	Day	Year
CITY OF TOWNSHIP OF ☒ <u>Troy</u>	1. <u>Carla Seidel</u>	<u>Carla Seidel</u>	<u>3535 Anvil Dr</u>	<u>48083</u>	<u>04</u>	<u>19</u>	<u>20</u>
CITY OF TOWNSHIP OF ☒ <u>Troy</u>	2. <u>Kyle Seidel</u>	<u>Kyle Seidel</u>	<u>3535 Anvil Dr.</u>	<u>48083</u>	<u>04</u>	<u>19</u>	<u>20</u>
CITY OF TOWNSHIP OF ☐	3.						
CITY OF TOWNSHIP OF ☐	4.						
CITY OF TOWNSHIP OF ☐	5.						
CITY OF TOWNSHIP OF ☐	6.						
CITY OF TOWNSHIP OF ☐	7.						
CITY OF TOWNSHIP OF ☐	8.						
CITY OF TOWNSHIP OF ☐	9.						
CITY OF TOWNSHIP OF ☐	10.						
CITY OF TOWNSHIP OF ☐	11.						
CITY OF TOWNSHIP OF ☐	12.						
CITY OF TOWNSHIP OF ☐	13.						
CITY OF TOWNSHIP OF ☐	14.						

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CIRCULATOR — DO NOT SIGN OR DATE
CERTIFICATE UNTIL AFTER CIRCULATING PETITION.

Tara McKendrick 4/19/20
(Signature of Circulator) (Date)
Tara McKendrick
(Printed Name of Circulator)
2462 Warwick Drive
(Complete Residence Address [Street and Number or Rural Route]) - [Do not enter a post office box]
Troy, MI 48084
(City or Township, State, Zip Code)
Oakland
(County of Registration, if Registered to Vote, of a Circulator who is not a Resident of Michigan)