

No. 23-719

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**In the  
Supreme Court of the United States**

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Donald J. Trump,  
*Petitioner,*

v.

Norma Anderson, et al.,  
*Respondents.*

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**On Writ of Certiorari to the Supreme Court of Colorado**

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**MOTION OF AMICI CURIAE  
TERPSEHORE “TORE” MARAS AND ELIGIBLE VOTERS  
OF ALL 50 STATES AND 1 TERRITORY FOR  
ENLARGEMENT AND DIVISION OF TIME FOR ORAL ARGUMENT**

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February 5, 2024

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1. *Amici Curiae* Terpsehore “Tore” Maras and Eligible Voters of All 50 States and 1 Territory respectfully seek leave to participate in oral argument under Rule 28.7, as *amici curiae* in support of Petitioner, for five minutes (or for such time as the Court deems proper) *in addition* to the time allocated to the parties. Granting this Motion assists the Court by showcasing simple alternate grounds for resolution not argued in the multitude of briefs now before the Court. Given Petitioner and Respondents have not yet consented to this motion, leave of the Court is now sought to provide dispositive arguments not otherwise before the Court.

2. Amici has worked expeditiously after final *amicus curiae* briefs in this matter were filed on January 31, 2024, to confirm no party or amicus has addressed their three arguments. Having ascertained that no other filer addressed or responded to these arguments, Amici now respectfully submit that allowing them five minutes for oral argument (or a longer period of time should the Court deem proper) will allow them to expound upon the following arguments:

- 1) *The Colorado Supreme Court’s ruling improperly creates rights not given it and in so doing violates the Ninth Amendment to the United States Constitution, with the following sub-arguments:*

- a. The Ninth Amendment, when properly used as a rule of construction, safeguards fundamental rights of the People such as the right vote impacted here.
- b. The Ninth Amendment ensures that the American people have the right to fair and free elections, and the *ultra vires* removal of a candidate violates that right.

2) *The Exclusion of President Trump by the Colorado Supreme Court violates the Tenth Amendment to the United States Constitution.*<sup>1</sup>

3) *President Trump did not allegedly “engage in insurrection” in Colorado; therefore, the Colorado lower court lacked subject matter jurisdiction over him.*

3. In addition, *amici* note that on February 2, the Supreme Court allocated oral argument time to Jenna Griswold, notwithstanding opposition from her fellow respondents. *Amici* hopes such a decision by the Court reflects a broader openness to incorporating diverse perspectives directly into the oral arguments – including the perspectives of voters from every state. Indeed, the Court has extended oral argument duration to 40 minutes for each party,

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<sup>1</sup> While *amici* note that other filers mention the 10<sup>th</sup> Amendment in their respective filings, no other filer has phrased the 10<sup>th</sup> Amendment implications as set forth by *Amici*. See e.g., *Amici Brief* at 10.

indicating an openness to hearing from all corners before rendering its historic decision.

4. Amici recognize the filing of the instant Motion is on the eve of oral argument and slightly wanders outside the traditional boundaries that typically define the roles of *amici*. However, *amici* respectfully submit that the unique constitutional issues set forth in their Brief – particularly those underscoring the rights and principles that directly impact the American People who are the ultimate benefactors of this nation’s system of government – merit direct advocacy before this Court.

5. In filing this Motion, *amici* seek to enhance the depth of the Court’s deliberations and ensure that the voices of the over 3,200 citizens from every state are heard. This is a testament to the belief of the American People in the justice system’s capacity to evolve and adapt in response to the complexities of the issues it faces.

**CONCLUSION**

For the foregoing reasons, Amici Curiae respectfully submit that, under our current historic circumstances, the Court benefits hearing oral argument from the very class of individuals whose constitutional rights this Court was largely established to protect – the American People, and respectfully request that their pending Motion be granted.

Respectfully submitted,

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Dated: February 5, 2024