

WAIVER

SUPREME COURT OF THE UNITED STATES

Supreme Court Case No. 25-437

Public Interest Legal Foundation v. Jocelyn Benson, et al.
(Petitioner) (Respondent)

I DO NOT INTEND TO FILE A RESPONSE to the petition for a writ of certiorari unless one is requested by the Court.

Please check one of the following boxes:

- Please enter my appearance as Counsel of Record for all respondents.
- There are multiple respondents, and I do not represent all respondents. Please enter my appearance as Counsel of Record for the following respondent(s):

Jocelyn Benson, in Her Official Capacity as Michigan Secretary of State

I certify that I am a member of the Bar of the Supreme Court of the United States (Please explain if your name has changed since your admission):

Signature Ann M. Sherman 11/5/2025

Date: November 5, 2025

(Type or print) Name Ann M. Sherman, Solicitor General
 Mr. Ms. Mrs. Miss

Firm Michigan Department of Attorney General

Address Post Office Box 30212

City & State Lansing, Michigan Zip 48909

Phone (517) 335-7628

A COPY OF THIS FORM MUST BE SENT TO PETITIONER'S COUNSEL OR TO PETITIONER IF *PRO SE*. PLEASE INDICATE BELOW THE NAME(S) OF THE RECIPIENT(S) OF A COPY OF THIS FORM. NO ADDITIONAL CERTIFICATE OF SERVICE IS REQUIRED.

SEE REVERSE FOR INFORMATION CONCERNING THE STATUS OF A CASE ON THE DOCKET.

CC: Kaylan Lytle Phillips
107 S. West St., Ste. 700 Alexandria, VA 22314