

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

UNITED STATES POSTAL SERVICE, ET AL., APPLICANTS

v.

CALIFORNIA, ET AL., RESPONDENTS

DONALD J. TRUMP, ET AL., APPLICANTS

v.

LEAGUE OF WOMEN VOTERS OF
MASSACHUSETTS, ET AL., RESPONDENTS

**On Application for a Stay of the Injunction Issued by the
United States District Court for the District of Massachusetts
and Request for an Immediate Administrative Stay**

**BRIEF OF *AMICUS CURIAE* DAVID
BOYLE IN SUPPORT OF NO PARTY**

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***AMICUS CURIAE* STATEMENT OF INTEREST**

The present *amicus curiae*, David Boyle (hereinafter, “Amicus”),¹ did not enjoy Applicants’ disturbing his Labor-Day-weekend rest with their arguable attempt to sabotage the U.S. midterm elections. However, duty calls, so he writes this brief. — From an abundance of caution, considering the possible twists of “stays”/“standing”, he doesn’t write this brief for any party; Amicus also writes for “no party” since he is writing to benefit the American people as a whole, not just Trump, or California, or women voters, et al. Americans deserve to have their votes counted, not destroyed.

Now follows a fable, after the Summary, about foxes, henhouses, and elections:

SUMMARY OF ARGUMENT

A fable is told, regarding the wisdom of letting foxes guard more henhouses after one such previous, disastrous incident. The U.S. Postal Service (“USPS”) can assist voters, but shouldn’t help sabotage elections, threaten separation of powers, or act Stalinesque, with rushed, questionable “innovations”, in our real, non-fable world.

ARGUMENT

I. A FABLE: “THE FOX WHO WANTED TO GUARD FIFTY HENHOUSES”

Once there was a very rapacious and cruel fox, who had a history of guarding henhouses badly. In fact, and shockingly, this fox was once chosen by the animals to be Fox-in-Chief—as many animals later regretted. When it was time to choose Animal-in-Chief again, the animals, including many chickens (chickens were so numerous that the 50 Provinces were called “Henhouses”) chose someone else.

¹ No party or its counsel wrote or helped write this brief, or gave money for it, *see* S. Ct. R. 37.

The fox raged. He fomented a riot to force the vote-counters at the Animals' Great Henhouse Assembly to choose him instead. (The Assembly impeached him, once, over a shady deal about Chicken Kiev.) With vulpine cunning, he, who was somehow trusted to *guard* the henhouse, instead *attacked* it. Rioters targeted the fox's own lieutenant, Mike Henn ("Henn" was sometimes a surname even for roosters), with nasty signs like, "Hang Mike Henn!", "Fry Mike!", and "INDIANA FRIED CHICKEN TONIGHT!" The fox even telephoned him, screaming, "Gimme the votes, you dumb cluck! Or I'll make you into a Sick-Fil-Ay sandwich!!" But the courageous Midwest bird held his own, and the voters removed the fox from office.

Animals' memories can be short, so, years later, the animals re-elected the fox as Fox-in-Chief. Naturally, the fox started failing again, and worried that the animals would, at the In-Between Election, choose Great Assembly leaders who planned to oppose him. So, he thought of a trick. —He would have the animals' mail-carriers, the Letter Lads (and Lasses), demand that the 50 Provincial Henhouses put pretty red bows of a particular size on the election mail (even if it was expensive and was rushed, far too rushed, to do so on all that mail), and that those Henhouses must give him lists of animals who would vote: but on very short notice, without adequate training time for election workers. The smarter animals were shocked at this subterfuge, which seemed calculated to lower the number of voters, and unfairly so.

Some of the Provincial Henhouses resorted to the mighty Law (oddly, some other Henhouses supported the fox, seeking favor); and the case, after filtering through various legal eagles and beagles, eventually came before... the **Supreme Horse**: a

great-sized, black-robed equine marvel with nine heads (like Cerberus, but with six more heads), a cousin of the mighty horse Boxer at G. Orwell’s Animal Farm.

“Oh Supreme Horse!” bellowed the fox’s lawyer, L. Oop Hole. “Let’s keep this argument short: some say my client the Fox-in-Chief guarded the Great Henhouse Assembly badly; so, just let him and his Letter Lads/Lasses guard *fifty* henhouses at once, the 50 Provinces! *Double down!*” This was maybe the stupidest legal argument ever made; so, the Supreme Horse rolled its 18 eyes, rolled over, and dropped dead. (It was later revived through horse-sized CPR, but was never quite the same again.)

The fox took the Horse’s collapse as approval, and implemented his postal trick, so that the fox and his mail-delivery mob guarded 50 Henhouses. And the blood flowed. —After the election, the fox’s mouth was full of many feathers, which he spat out, and his belly full of many, many hens. But this was not enough; he viewed a picture of the Supreme Horse, and said, “I am developing a taste for *horse meat*.”

II. THE USPS SHOULD NOT BE ALLOWED TO SABOTAGE ELECTIONS—AND THAT’S NO FABLE

If the Fable, *supra*, reminds people of real life, it is what it is. Re “eating horse meat”: “Federal judges say they’re worried about increased threats [in] Trump’s second term, a trend some say is fueled by politically charged cases, online harassment and personal attacks from the president and his allies.” Jalen Beckford, *Federal judges say they’re facing intensified threats since start of Trump’s second term*, Politico, Sept. 2, 2026, 7:01 p.m., <https://tinyurl.com/59nhpwbz> (all links here last checked Sept. 9, 2026). And, election law is in States’ and Congress’ bailiwick, U.S. Const. art. I, § 4, cl. 1, not the Executive’s; so, Trump’s maneuvers, postal or

not, threaten both judiciary and legislature, offending the separation of powers.

(Some States may claim they can comply with *Ballot Mail for Federal Elections*, 91 Fed. Reg. 54,966 (Aug. 26, 2026) (“the Rule”), *see* Appl. at 31; but that may stem more from political considerations, or willingness, say, to see minority-voter turnout lessened—as has happened in history—, than from a concern for all voters’ rights.)

Even if the USPS has done things, without specific Congressional authority, to *facilitate* election mail, *see* Appl. at 20 (not treating absentee-ballot items without postage, as unpaid mail; etc.), that doesn’t mean they have a right to *delay*, *harass*, or *prevent* election mail. Some “play in the joints”, to further purposes of democracy and voters’ power, shouldn’t be confused with taking latitude to *frustrate* those purposes. Being fraternally helpful, shouldn’t let the USPS turn into Big Brother.

Applicants’ fevered attempts to justify their last-minute, disruptive maneuvers remind one of the current film *Coyote vs. Acme* (Warner Animation Group 2026) (animals’ cartoonish legal machinations). Indeed, the mass of regulations, etc. with which States must quite rapidly deal under the Rule, resembles a denial-of-service cyberattack: “[T]he myriad aforementioned obstacles and negligible amount of time for officials to familiarize themselves with new processes (let alone successfully implement the new requirements) will make compliance by State and local officials with the Final Rule ‘virtually impossible’ for the November 3, 2026 midterm elections”, 26A305 Appendix (“App.”) at 43a-44a (Talwani, J.) (footnote omitted).

Indeed, there is something rather... *Bolshevik* about the Rule and its centralized, rapid, shock takeover of traditional, regional election procedures. *See* the alleged

Joseph Stalin quote, “Those who vote decide nothing. Those who count the vote decide everything.” (c. 1923) This quote, *see id.*, reminds Amicus of what Trump and Applicants are doing with the Rule, except that Trump may be going even further than Stalin, in that the Rule may prevent people from voting in the first place.

So, the Court, like others, should “quit Stalin” (...) and, if the law allows, not approve of any USPS measure, Bolshevik or otherwise, that may disenfranchise the 50 States’ voters. Trump fomented, in whole or part, perhaps the worst voter-fraud attempt in U.S. history, the January 6, 2021 terroristic attack on the U.S. Capitol; thus, his Rule may be like the fox guarding the henhouse—or the “henhouses” of 50 States. As the saying goes, “Fooled me once, shame on you; fooled me twice, shame on me.” And as Gloria Steinem (RIP) said in her 2017 speech for the Women’s March on Washington: “Remember, the Constitution doesn’t begin with, ‘I, the president.’ It begins with, ‘We, the people.’” Emma Banks, *Gloria Steinem’s 15 Most Powerful Quotes*, People, Sept. 3, 2026, 1:25 p.m., <https://tinyurl.com/34zazsbe>.

Finally: this Court, hopefully, will have the “horse sense” not to fall for the Trojan horse that the Rule offers, of pretending to prevent fraud, but potentially enabling fraud far worse than what it purports to prevent. Sense trumps stupidity.

CONCLUSION

The Court should protect, as much as the law allows, voters’ rights to vote, and States’ and Congress’ rights not to have needless Executive interference hampering voters’ rights. Amicus humbly thanks the Court for its time and consideration.

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Respectfully submitted,

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