

STATE OF WISCONSIN
SUPREME COURT

Appeal No. 2015-AP-001858

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OF WISCONSIN

Voters with Facts, Pure Savage Enterprises, LLC,
Wisconsin Three, LLC, 215 Farwell LLC, Dewloc, LLC,
Leah Anderson, J. Peter Bartl, Cynthia Burton,
Corinne Charlson, Maryjo Cohen, Jo Ann Hoepfner Cruz,
Rachel Mantik, Judy Olson, Janeway Riley,
Christine Webster, Dorothy Westermann, Janice Wnukowski,
David Wood and Paul Zank,

Plaintiffs-Appellants-Petitioners,

v.

City of Eau Claire and City of Eau Claire
Joint Review Board,

Defendants-Respondents.

**LEAGUE OF WISCONSIN MUNICIPALITIES, CITY OF MILWAUKEE,
CITY OF MADISON, WISCONSIN TOWNS ASSOCIATION, JOINT
NOTICE OF MOTION
AND MOTION FOR PERMISSION TO FILE
A JOINT NON-PARTY BRIEF AS *AMICI CURIAE***

Notice is given that the League of Wisconsin Municipalities, by Claire Silverman, its Legal Counsel, the City of Milwaukee, by City Attorney Grant F. Langley, by Deputy City Attorney Mary L. Schanning and Assistant City Attorney Gregg Hagopian, the City of Madison, by City Attorney Michael May, and the Wisconsin Towns Association, by Richard Manthe, its Legal Counsel, pursuant to Wis. Stat. 809.19 (7), hereby move this Honorable Court for permission to file a joint, non-party brief as *amici curiae*.

In the event permission to file a joint brief is not allowed, each movant, in the alternative, hereby moves the Honorable Court for permission to file individual, non-party briefs as *amicus curiae*.

Per Wis. Stat. 809.19 (7)(a), movants identify their interests and explain desirability of movants' participation as *amici curiae*.

The League of Wisconsin Municipalities ("LWM") has been in existence since December 14, 1898. Its purpose is to help Wisconsin cities and villages share ideas and learn from one another, to train and provide information to people elected and appointed to govern cities and villages, and to advocate on their behalf. LWM is a member of Competitive Wisconsin, a nonpartisan public policy organization consisting of business, labor, education and agriculture leaders in Wisconsin working together to focus attention on Wisconsin's economic competitiveness, and a member of the National League of Cities. Many of LWM's members use tax incremental financing ("TIF") under Wis. Stat. 66.1105 to lessen blight, and to promote economic development and revitalization.

The City of Milwaukee is Wisconsin's largest city and its sole first-class city, and it uses TIF.

The City of Madison is Wisconsin's second largest city, the capital of the state, and it uses TIF.

The Wisconsin Towns Association ("WTA") helps Wisconsin towns share ideas and learn from one another, trains and provides information to people

elected and appointed to govern towns, and advocates on behalf of towns. Many of WTA's members use TIF.

This case involves important public policy and legal issues that will have a profound impact on the state, its local governments, economic development, and the public. The proper interpretation of Wis. Stat. 66.1105, Wisconsin's Uniformity Clause and Public Purpose Doctrine, and the availability of TIF as a tool for blight reduction and economic development are vitally important to each of the movants. Equally important are the standing, justiciability, and procedural issues at stake.

Movants have practical experience applying, using, and implementing Wis. Stat. 66.1105 on a wide variety of projects. Movants will provide valuable insight and perspective to the Supreme Court as it considers the issues and the parties' arguments. Accordingly, movants respectfully seek permission to be able to participate in this case as *amici curiae*.

Dated and signed this 5th day of December , 2017.

CITY OF MILWAUKEE

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By: 
MARY L. SCHANNING, Deputy City Attorney, SBN 1029016

By: 
GREGG C. HAGOPIAN, Assistant City Attorney, SBN 1007373

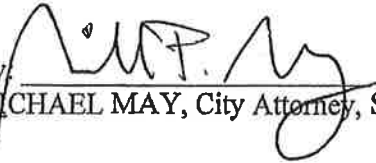
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