

**STATE OF MICHIGAN  
IN THE SUPREME COURT**

**MICHIGAN SENATE and MICHIGAN  
SENATE MAJORITY LEADER WINNIE  
BRINKS**, in her official capacity,

Supreme Court Case No.  
Court of Appeals Case No. 374786  
Court of Claims Case No. 25-000014-MB  
Hon. Sima G. Patel

Plaintiffs-Appellees and  
Cross-Appellants,

v

**MICHIGAN HOUSE OF REPRESENTATIVES,  
MICHIGAN HOUSE SPEAKER MATT HALL**,  
in his official capacity, and **MICHIGAN HOUSE  
CLERK SCOTT STARR**, in his official capacity,

Defendants-Appellants and  
Cross-Appellees.

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**PLAINTIFFS-APPELLEES AND CROSS-APPELLANTS MICHIGAN SENATE AND  
MICHIGAN SENATE MAJORITY LEADER'S MOTION FOR IMMEDIATE AND  
EXPEDITED CONSIDERATION OF APPLICATION FOR LEAVE TO APPEAL  
BEFORE DECISION BY THE COURT OF APPEALS**

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NOW COME the above-captioned Plaintiffs-Appellees and Cross-Appellants, by and through their attorneys, Goodman Acker, P.C., and for their Motion for Immediate and Expedited Consideration of Application for Leave to Appeal Before Decision by the Court of Appeals state as follows:

1. This case involves the failure of the Michigan House to perform its constitutional duty under Article 4, § 33 to present nine bills that have passed the Legislature to the Governor. The Michigan Senate filed suit to enforce that duty.

2. This appeal and cross-appeal involve a ruling by the Court of Claims Granting in Part the Senate's Motion for Summary Disposition and Granting in Part the House's Countermotion for Summary Disposition. In so doing, the Court of Claims found the following: (1) the Senate and Senate Majority Leader have standing; (2) the case presents a justiciable question; (3) Article 4, § 33 requires presentment of all bills passed by both Legislative houses, at least 14 days before their effective date; and (4) the Senate is entitled to a declaratory judgment, but not mandamus or injunctive relief at that time.<sup>1</sup>

3. The effective date of the nine bills is April 2, 2025, which makes the deadline to present March 19, 2025. The House has indicated that it will not present them. Instead, it appealed.

4. That appeal and the Senate's cross-appeal from the Court of Claims' ruling are pending in the Court of Appeals, Case No. 374786.

5. It is a virtual certainty that any decision by the Court of Appeals will be appealed to this Court by the losing party. But with the April 2, 2025, effective date of the nine bills rapidly approaching, there is not time for considered decisions from both the Court of Appeals and this

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<sup>1</sup> The Court of Claims also found that Speaker Hall is privileged from civil process, but the Senate did not appeal this determination.

Court. Unless given immediate effect, laws take effect 90 days after the Legislature adjourns. Const 1963, art 4, § 27. None of the nine bills were given immediate effect, so if signed by the Governor, they will take effect on April 2, 2025, 90 days after the 2023–2024 Legislature adjourned. But before their effective date, other events must occur. The Governor has up to 14 days after presentation to consider bills. Const 1963, art 4, § 33. To allow the Governor her constitutionally mandated period of 14 days to consider a bill after presentation but before the April 2, 2025, effective date of the bills she signs, this matter requires immediate and expedited consideration and decision.

6. By their Motion for Immediate and Expedited Consideration of its Application, Plaintiffs-Appellees and Cross-Appellants seek to expedite consideration of that Application in every way possible.

WHEREFORE, for the foregoing reasons, Plaintiffs-Appellees and Cross-Appellants respectfully request that this Motion be granted; that its Application be immediately and expeditiously considered by the Court; that its Application be granted; and that the Court award the relief sought by the Application.

Respectfully submitted,

/s/ Mark Brewer  
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**Proof of Service**

The undersigned certifies that on March 17, 2025, the foregoing instrument(s) electronically filed the foregoing papers with the Clerk of the Court using the Electronic Filing System which will send notification of such filing to all attorneys of record.

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 /s/ Elizabeth M. Rhodes  
 Elizabeth M. Rhodes

Dated: March 17, 2025