

STATE OF MAINE

SUPREME JUDICIAL COURT  
Sitting as the Law Court  
Docket No. Ken-24-24

DONALD J. TRUMP,

)  
)  
)  
)  
)  
)  
)  
)  
)  
)  
)  
)

v.

SECRETARY OF STATE, et al.

MOTION OF SECRETARY OF STATE  
SHENNA BELLOWS FOR  
ENLARGEMENT OF PAGE LIMITS,  
WITH INCORPORATED  
MEMORANDUM OF LAW

Pursuant to M.R. App. P. 10(a)(1), Respondent-Appellant Secretary of State Shenna Bellows moves for an enlargement of the page limits in this appeal. Specifically, the Secretary respectfully requests that the Court permit the filing of sixty (60) page briefs. Appellants Kimberly Rosen, Thomas Saviello, and Ethan Strimling join in this request. Undersigned counsel inquired as to Mr. Trump’s position on the substance of the motion late yesterday afternoon but has not received a response.

There is good cause for the enlargement. This case raises a number of thorny and overlapping legal and factual issues. Specifically, it involves (1) matters of first impression regarding the scope of the Secretary’s authority under 21-A M.R.S. §§ 336 and 337; (2) significant questions of federal

constitutional law concerning the scope and enforceability of Section Three of the Fourteenth Amendment; and (3) a multi-faceted factual inquiry based on a record of nearly 6,000 pages.

Given the number and depth of the issues involved, the parties' opening briefs totaled more than 200 pages in the Superior Court.<sup>1</sup> Here, there is an additional issue to brief, namely the legality of the Superior Court's remand order under 21-A M.R.S. § 337(2)(D).

---

<sup>1</sup> Notably, the Secretary's brief was less than 50 pages, though after converting her brief to the typeface requirements of this Court, it would have been greater than 60 pages.

## CONCLUSION

For the reasons stated above, to ensure the Secretary can adequately address each of the issues on appeal, the Secretary respectfully requests that the Court grant an enlargement of the page limits in this appeal to sixty pages.

Dated: January 23, 2024

AARON M. FREY  
Attorney General

/s/ Jason Anton  
Jason Anton  
Assistant Attorney General  
Maine Bar No. 6272

Thomas A. Knowlton  
Deputy Attorney General  
Maine Bar No. 7907

Office of the Attorney General  
6 State House Station  
Augusta, Maine 04333  
jason.anton@maine.gov  
(207) 626-8800

*Attorneys for Secretary of State  
Shenna Bellows*

## CERTIFICATE OF SERVICE

I, Jason Anton, Assistant Attorney General, hereby certify that I have caused a copy of this Motion of Secretary of State Bellows for Enlargement of Page Limits to be served on all counsel of record via electronic mail.

Dated: January 23, 2024

/s/ Jason Anton

Jason Anton  
Assistant Attorney General  
Maine Bar No. 6272

Office of the Attorney General  
6 State House Station  
Augusta, Maine 04333  
jason.anton@maine.gov  
(207) 626-8800