

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF ANTRIM

WILLIAM BAILEY

Plaintiff

Case No. 20-9238-CZ

v.

ANTRIM COUNTY, SECRETARY OF STATE JOCELYN BENSON, in her official and individual capacity, JONATHAN BRATER, in his official and individual capacity, SHERYL GUY, in her official and individual capacity, and MILLER CONSULTATIONS & ELECTIONS, INC., d/b/a ELECTION SOURCE, a Michigan corporation

HON. KEVIN A. ELSENHEIMER

Defendants.

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**PLAINTIFF'S MOTION FOR RECONSIDERATION OR, ALTERNATIVELY,  
REHEARING PURSUANT TO MCR 2.119(F)**

Plaintiff, WILLIAM BAILEY ("Plaintiff"), by and through his attorney, DePerno Law Office, PLLC, moves this Honorable Court to reconsider its Errata Order dated May 19, 2021, regarding Defendants' joint motion for summary disposition, for the following reasons:

1. This motion is filed pursuant to MCR 2.119(F).
2. This motion is filed within 21 days of entry of the Errata Order, pursuant to MCR 2.119(F).
3. The Court committed palpable error when it granted Defendants' motion for summary disposition pursuant to MCR 2.116(C)(4).
4. A copy of the Errata Order is attached hereto as Exhibit 1.
5. In support of this Motion, Plaintiff submits and relies on the accompanying Brief in Support of Motion for Reconsideration being filed herewith.

**WHEREFORE**, for the reasons stated in Plaintiff's accompanying brief, Plaintiff respectfully requests that this Honorable Court grant Plaintiff's motion for reconsideration, or in the alternative grant a rehearing, and reinstate all of the claims in his complaint.

Respectfully submitted  
DePERNO LAW OFFICE, PLLC

Dated: June 9, 2021

/s/ Matthew S. DePerno  
Matthew S. DePerno (P52622)  
Attorney for Plaintiff

**PROOF OF SERVICE**

On the date set forth below, I caused a copy of the following documents to be served on all attorneys of record at the addresses listed above

1. Plaintiff's Motion for Reconsideration

Service was electronically using the MiFile system which will send notification of such filing of the foregoing document to all attorneys of record.

Dated: June 10, 2021

/s/ Matthew S. DePerno

Matthew S. DePerno (P52622)