

IN THE
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

RICHARD STANLEY, JR)	
and TIM CLARK)	
)	Cause No. 25-1482
Plaintiffs,)	
)	
vs.)	
)	
BROWN COUNTY ELECTION)	
BOARD)	
)	
Defendant.)	
)	

**PLAINTIFFS’ MOTION FOR LEAVE TO FILE
A SUPPLEMENTAL RESPONSE TO DEFENDANT’S MOTION TO DISMISS**

Plaintiffs request leave to file a supplemental response to Defendant’s Motion to Dismiss because of a change in the underlying facts that has just occurred. On October 20, 2025, Plaintiff Mr. Stanley announced that he plans to run for the elected office of County Commissioner in Brown County Indiana in the 2026 election cycle.¹ On August 25, 2025 (almost two months ago) when Plaintiffs filed their response to Defendant’s Motion to Dismiss, Mr. Stanley’s position at the time was that he was “unwilling to formally announce his candidacy for any position as long as the cloud of the Indiana Republican Party’s decision remains over his head.” However, political campaigns move quickly, and as a result, Mr. Stanley has concluded that it would be detrimental for him to hold off any longer on announcing his candidacy. Thus, the underlying facts relevant to Defendant’s Motion to Dismiss have changed. There is no longer just a 100% chance that Mr. Stanley intends to run for elected office in the future; Mr. Stanley

¹ This can be seen on the Brown County Indiana Government Meetings channel on YouTube in the October 20, 2025 Brown County Council Meeting at 2:54:00-2:57:00.

has now already begun his campaign by announcing his plans to run for elected office in a public forum. Although the facts of the case as they stood when Plaintiffs filed their response to Defendant's Motion to Dismiss were already ripe for decision by the Court, the change to Mr. Stanley's candidacy makes the necessity of a decision by the Court even more urgent and inevitable.

Dated: October 21, 2025

By: Rich Stanley
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CERTIFICATE OF SERVICE

I certify that on October 21, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. A copy of this filing will be sent to counsel of record by operation of the Court's electronic filing system.

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