

BY BRYNA GODAR

Wisconsin Supreme Court: 2024-25 Term Review and 2025-26 Preview



The 2024-25 Wisconsin Supreme Court term wrapped up with a series of high-profile decisions, including on abortion, administrative rulemaking, and the governor's partial veto power. This article summarizes some of the court's most notable 2024-25 rulings, including several that implicate democracy and state constitutional law.

The 2024-25 Wisconsin Supreme Court term wrapped up in June and July with a series of high-profile decisions, including on abortion, administrative rulemaking, and the governor's partial veto power. The court issued a total of 23 opinions this term,¹ an increase from last term's record low of 14 opinions² but still far below the past decade's average of roughly 50 opinions per term.³

The term also saw the lowest percentage of 4-3 splits in six years. Even including two cases that arguably did not entail a true 4-3 divide,⁴ the court split 4-3 only five times – 22% of cases – all on ideological lines. (Without those two cases, only 13% of the court's rulings were 4-3.) That marks a return to pre-2019 levels. In the past five years, the court has split 4-3 in an average of 35% of cases each term, though often not on ideological lines.⁵

This article summarizes some of the court's most notable 2024-25 rulings, including several that implicate democracy and state constitutional law. It also previews what could be ahead in the court's next term, which begins in September 2025.

Abortion

The term's headliner case was *Kaul v. Urmanski*,⁶ a long-awaited decision on the legality of abortion in Wisconsin. The case began in 2022 after the U.S. Supreme Court overturned federal abortion protections in *Dobbs v. Jackson Women's Health Organization*.⁷ Wisconsinites immediately faced uncertainty over the status of an 1849 law that prohibits "intentionally destroy[ing] the life of an unborn child."⁸

In *Urmanski*, the Wisconsin Supreme Court ruled 4-3 that the 1849 law was impliedly repealed by later laws and therefore does not ban abortion today.⁹ The majority opinion, by Justice Rebecca Dallet, concluded that the past 50 years of Wisconsin laws regulating "virtually every aspect

of abortion" were "clearly meant as a substitute" for the preexisting "near-total ban."¹⁰ If the 1849 law did operate as a ban, the court reasoned, these later statutes would be unnecessary or "swallowed whole."¹¹ In a concurrence, Chief Justice Jill Karofsky¹² provided historical and "real-world" context for the court's decision, describing the accounts of women who died under abortion bans, including her own great-grandmother.¹³

In three dissenting opinions, Justice Rebecca Grassl Bradley, Justice Annette Ziegler, and Justice Brian Hagedorn (joined by Justice Bradley) accused the majority of "eras[ing] a law it does not like,"¹⁴ "legislating under the guise of a judicial opinion,"¹⁵ and engaging in "pure policymaking."¹⁶ They argued that the court should have instead left the question to the Wisconsin Legislature.¹⁷

Notably, the court based its decision on principles of statutory interpretation, not constitutional law. The court did not address whether the Wisconsin Constitution provides any protections for abortion. Because the court concluded that the 1849 statute is no longer in effect as an abortion ban, it dismissed as moot a related case raising the constitutional issue.¹⁸

Separation of Powers

In the 2024-25 term, the court also continued to address major constitutional questions about legislative and executive powers. These cases largely centered on the governor's partial veto and the powers of legislative committees – both areas in which Wisconsin has long been a national outlier.¹⁹

Partial Veto. The court issued two rulings involving the governor's power to issue partial vetoes, agreeing with Governor Tony Evers in one case and rejecting his position in the other.

In *LeMieux v. Evers*,²⁰ the court upheld Governor Evers' creative partial veto of a provision in the state's 2023-25 budget that increased an education

revenue limit. By striking individual digits and dashes, Evers changed “2025” to “2425,” thereby extending the revenue limit increase for 402 years instead of two.²¹ His veto continued a long history of Wisconsin governors using the partial veto to creatively rewrite budget provisions.²² Aside from a 2020 case in which no majority could agree on a new standard,²³ the court has long been extremely deferential to these maneuvers,²⁴ requiring only that the remaining bill be “complete, entire, and workable”²⁵ and “germane” to the original bill.²⁶ Voters, meanwhile, have twice approved constitutional amendments reining in this power, prohibiting the governor from combining parts of sentences to create new sentences and from “creat[ing] a new word by rejecting individual letters.”²⁷

In *LeMieux*, the court disagreed with the argument that, by striking individual digits to create a new year, Governor Evers violated the constitutional restriction on deleting letters. In a 4-3 decision written by Justice Karofsky, the court noted that it “has explicitly treated letter and digit vetoes separately, both before and after [the constitutional amendment’s] adoption” – and

the amendment only applies to “letters,” not “digits.”²⁸ The court also rejected petitioners’ arguments for further reining in the partial veto, noting that petitioners had not asked the court to overrule any of its partial-veto precedents.²⁹

Justice Dallet concurred but noted that she would be “open to revisiting” the court’s partial-veto jurisprudence if given a “clear opportunity” to do so.³⁰ Justice Hagedorn, joined by Chief Justice Ziegler and Justice Rebecca Bradley, dissented, arguing that “*stare decisis* should yield” “where the governor’s actions are so out of step with the constitutional order.”³¹ Thus, at least four justices appear open to limiting the governor’s broad partial-veto authority, suggesting more litigation to come.

Meanwhile, in a second partial-veto case, the court ruled against the governor, reinforcing the requirement that the partial veto can be used only on appropriation bills. In *Wisconsin Legislature v. Department of Public Instruction (DPI)*,³² the court unanimously reaffirmed a bright-line rule that, “To qualify as an appropriation bill, a bill must set aside public funds for a public purpose within its four corners.”³³ Governor Evers had vetoed part of a bill that related to

funding for a literacy program. Because the bill did not appropriate money within its “four corners,” the court rejected the partial veto as invalid.³⁴

The *DPI* case also raised key questions about a budgetary practice of allocating money for planned expenses to the Joint Committee on Finance’s (JFC) supplemental funding account, which JFC members then control. The governor and the DPI argued that this arrangement unconstitutionally allows the JFC to operate as a “mini legislature” when doling out those funds.³⁵ But the court largely sidestepped those issues based on the lack of an appropriate remedy, concluding that, “[e]ven if [the DPI and the governor] were correct that appropriating money to [the JFC] is unlawful, no remedy under law entitles DPI to receive it instead.”³⁶ The constitutionality of this budgeting process thus remains an open question, and the 2025-27 budget continues this practice.³⁷

Legislative Committee Powers.

Although the court did not address the legislative committee issues in the *DPI* case, it did rein in legislative committee powers in two other key cases: *Evers v. Marklein* and *Kaul v. Wisconsin Legislature*.

*Evers v. Marklein (Evers II)*³⁸ continued a case that began in the 2023-24 term, challenging various legislative committee vetoes over executive branch actions. In *Evers v. Marklein (Evers I)*,³⁹ the court struck down the JFC’s ability to veto Department of Natural Resources’ expenditures of already appropriated



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funds, concluding 6-1 that the practice violated the Wisconsin Constitution's separation-of-powers principles.

In *Evers II*, the court held that it violates the separation of powers for the Joint Committee for Review of Administrative Rules (JCRAR) to unilaterally block administrative rules, which it sometimes did for months to years at a time.⁴⁰ In a 4-3 decision by Chief Justice Karofsky, the court adopted the U.S. Supreme Court's approach in *Immigration & Naturalization Service v. Chadha*,⁴¹ holding that "legislative action that alters the legal rights and duties of persons outside of the legislative branch triggers the requirements of bicameralism and presentment."⁴² According to the court, because the JCRAR's interventions altered legal rights and duties without bicameralism and presentment, they violated the state constitution.⁴³ The court overruled a prior case, *Martinez v. Department of Industry, Labor & Human Relations*,⁴⁴ and several paragraphs of *Service Employees International Union Local 1 v. Vos*,⁴⁵ which had allowed legislative committees to temporarily suspend administrative rules.⁴⁶

Justice Hagedorn concurred in part, agreeing that the JCRAR's objection to a proposed building code rule was unconstitutional given its indefinite nature.⁴⁷ But he also dissented in part, arguing that deeper questions about administrative rulemaking were "insufficiently addressed by the parties and the majority" and that the court therefore should have left the broader challenges to the JCRAR's authority for another day.⁴⁸ Justice Ziegler and Justice Rebecca Bradley dissented in full, rejecting the majority's separation-of-powers analysis.⁴⁹ In line with her *Evers I* concurrence, Justice Bradley invoked the nondelegation doctrine, arguing that administrative rulemaking involves an unconstitutional delegation of lawmaking power.⁵⁰ In her view, it was the administrative rules themselves, rather than the JCRAR's role in blocking those rules, that

raised separation-of-powers concerns.⁵¹

In contrast to the split decision in *Evers II*, another legislative-committee case drew unanimous agreement. In *Kaul v. Wisconsin Legislature*,⁵² Attorney General Josh Kaul challenged a law barring the Wisconsin Department of Justice (DOJ) "from settling most civil cases unless and until it receives the approval of the Joint Finance Committee."⁵³ The court in 2020 rejected a facial challenge to the law.⁵⁴ But in *Kaul*, the attorney general challenged the provision's application to two narrower sets of cases: "civil enforcement actions and cases DOJ brings at the request of executive-branch agencies for programs those agencies are statutorily charged with administering."⁵⁵ In a unanimous opinion by Justice Hagedorn, the court concluded that settling these types of cases falls "within the core powers of the executive branch, and the statutory requirement to obtain JFC's

approval prior to settling these cases violates the Wisconsin Constitution's separation of powers."⁵⁶

Elections

For a term that fell during a presidential election year, the court ultimately addressed relatively few election-related cases.

The most significant of these may be *Brown v. Wisconsin Elections Commission*,⁵⁷ which will affect who can bring election lawsuits to state court. The case stemmed from a complaint Kenneth Brown filed with the Wisconsin Elections Commission (WEC), arguing that aspects of the Racine clerk's administration of in-person absentee voting in the August 2022 primary violated state law.⁵⁸ The WEC found no probable cause that a violation had occurred,⁵⁹ and Brown then appealed under a statute that allows a "complainant who is aggrieved by an order" of the

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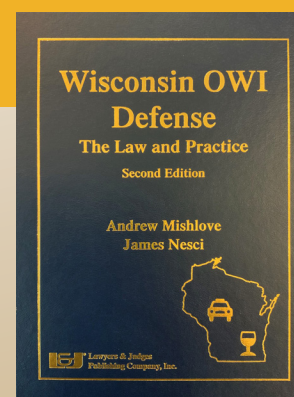
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Wisconsin Supreme Court, Holdings and Votes – 2024-25 Term

Civil Law Decisions, 2024-25

1. *Kennedy v. Wisconsin Elections*

Comm'n, 2024 WI 37, 413 Wis. 2d 509, 11 N.W.3d 786 (Sept. 27, 2024)

Subject area: Election law

Holding: The circuit court did not erroneously exercise its discretion in denying a temporary injunction to Robert F. Kennedy Jr. that the Wisconsin Elections Commission remove his name from the presidential ballot contrary to Wis. Stat. section 8.35(1).

Vote: 7-0

PER CURIAM (order), ZIEGLER, A. BRADLEY, R. BRADLEY, DALLET, KAROFISKY, HAGEDORN, and PROTASIEWICZ
R. BRADLEY (concurring), joined by ZIEGLER.

2. *Wisconsin Voter Alliance v. Secord*, 2025 WI 2, 414 Wis. 2d 348, 15 N.W.3d 872 (Jan. 17, 2025)

Subject area: Appellate procedure

Holding: The court of appeals was bound to follow an earlier published decision of the court of appeals that addressed the same issue.

Vote: 5-2

PROTASIEWICZ (majority opinion), joined by A. BRADLEY, DALLET, HAGEDORN, and KAROFISKY
HAGEDORN (concurrency)
R. BRADLEY (dissent), joined by ZIEGLER

3. *Morway v. Morway*, 2025 WI 3, 414 Wis. 2d 378, 15 N.W.3d 886 (Jan. 22, 2025)

Subject area: Appellate procedure

Holding: The Wisconsin Court of Appeals correctly dismissed the appeal in this case for lack of jurisdiction because the notice of appeal was untimely.

Vote: 4-2

A. BRADLEY (majority opinion), joined by DALLET, KAROFISKY, PROTASIEWICZ
DALLET (concurrency)
HAGEDORN (dissent), joined by R. BRADLEY
ZIEGLER (did not participate)

4. *Wisconsin Elections Comm'n v. LeMahieu*, 2025 WI 4, 414 Wis. 2d 571, 16 N.W.3d 469 (Feb. 7, 2025)

Subject area: Election law

Holding: The Wisconsin Elections Commission does not have a duty to appoint a new administrator when the term of the current administrator expires and the current administrator lawfully holds over in that position.

Vote: 7-0

ZIEGLER (majority opinion), joined by A. BRADLEY, R. BRADLEY, DALLET, HAGEDORN, KAROFISKY, and PROTASIEWICZ
A. BRADLEY (concurrency), joined by DALLET and KAROFISKY
R. BRADLEY (concurrency), joined by ZIEGLER

5. *Brown v. Wisconsin Elections*

Comm'n, 2025 WI 5, 414 Wis. 2d 601, 16 N.W.3d 619 (Feb. 18, 2025)

Subject area: Election law

Holding: The plaintiff lacked standing to appeal an adverse decision of the Wisconsin Elections Commission.

Vote: 4-3

KAROFISKY (majority opinion), joined by A. BRADLEY, DALLET, and PROTASIEWICZ
ZIEGLER (dissent)
R. BRADLEY (dissent), joined by ZIEGLER with respect to ¶¶ 43-44, and in which HAGEDORN joined with respect to ¶¶ 28-43.

6. *Halter v. Wisconsin Interscholastic Athletic Ass'n*, 2025 WI 10, 415 Wis. 2d 384, 19 N.W.3d 58 (April 8, 2025)

Subject area: Sports law

Holding: The Wisconsin Interscholastic Athletic Association acted reasonably when it decided that under its rules an athlete was ineligible to compete in a wrestling match.

Vote: 5-2

HAGEDORN (majority opinion), joined by A. BRADLEY, DALLET, KAROFISKY, and PROTASIEWICZ
PROTASIEWICZ (concurrency), joined by KAROFISKY
ZIEGLER (dissent), joined by R. BRADLEY

7. *Oconomowoc Area Sch. Dist. v. Cota*, 2025 WI 11, 416 Wis. 2d 1, 20 N.W.3d 182 (April 10, 2025)

Subject area: Employment law

Holdings: Noncriminal offenses may fall within the reach of arrest records under

the Wisconsin Fair Employment Act, and the school district engaged in arrest-record discrimination.

Vote: 5-2

DALLET (majority opinion), joined by A. BRADLEY, HAGEDORN, KAROFISKY, and PROTASIEWICZ
PROTASIEWICZ (concurrency)
ZIEGLER (dissent)
R. BRADLEY (dissent), joined by ZIEGLER

8. *LeMieux v. Evers*, 2025 WI 12, 415 Wis. 2d 422, 19 N.W.3d 76 (April 18, 2025)

Subject area: State government

Holding: The governor's partial vetoes under scrutiny in this case did not violate article V, section 10(1)(b) or (c) of the Wisconsin Constitution.

Vote: 4-3

KAROFISKY (majority opinion) joined by A. BRADLEY, DALLET, and PROTASIEWICZ with respect to ¶¶ 1-19 and 25-31, and joined by A. BRADLEY and PROTASIEWICZ with respect to ¶¶ 20-24
DALLET (concurrency)
HAGEDORN (dissent), joined by ZIEGLER and R. BRADLEY

9. *Hubbard v. Neuman*, 2025 WI 15, 416 Wis. 2d 170, 20 N.W.3d 720 (May 23, 2025)

Subject area: Medical malpractice

Holding: The complaint properly stated a claim against the plaintiff's physician.

Vote: 5-2

A. BRADLEY (majority opinion), joined by DALLET, HAGEDORN, KAROFISKY, and PROTASIEWICZ
ZIEGLER (dissent), joined by R. BRADLEY

10. *State v. H.C.*, 2025 WI 20, 416 Wis. 2d 233, 21 N.W.3d 330 (June 3, 2025)

Subject area: Family law

Holding: The dispositional phase of a termination of parental rights proceeding is a discretionary determination of the child's best interests; the statute does not impose a burden of proof.

Vote: 7-0

R. BRADLEY (majority opinion), joined by ZIEGLER, HAGEDORN, KAROFISKY, and PROTASIEWICZ
A. BRADLEY (concurrency), joined by DALLET



11. *Kaul v. Wisconsin State Legislature*, 2025 WI 23, 416 Wis. 2d 322, 21 N.W.3d 513 (June 17, 2025)

Subject area: Separation of powers

Holding: The Wisconsin Legislature cannot give itself the power to control litigation by requiring the attorney general to submit proposed settlements for legislative approval in cases the statutes empower the Department of Justice to undertake.

Vote: 7-0

HAGEDORN (majority opinion), joined by A. BRADLEY, ZIEGLER, R. BRADLEY, DALLET, KAROFISKY, and PROTASIEWICZ

12. *Wisconsin Mfrs. & Com. Inc. v. Wisconsin Nat. Res. Bd.*, 2025 WI 26, 416 Wis. 2d 561, 21 N.W.3d 718 (June 24, 2025)

Subject area: Administrative rulemaking

Holdings: The Wisconsin Administrative Procedure and Review Act does not require the Department of Natural Resources (DNR) to promulgate rules before posting statements on its website or communicating to responsible parties because they were guidance documents. The DNR has explicit authority to enforce a threshold for reporting the discharge of hazardous substances.

Vote: 5-2

PROTASIEWICZ (majority opinion), joined by A. BRADLEY, DALLET, HAGEDORN, and KAROFISKY
HAGEDORN (concurrency)
R. BRADLEY (dissent), joined by ZIEGLER

13. *McDaniel v. Wisconsin Dep't of Corr.*, 2025 WI 24, 416 Wis. 2d 516, 21 N.W.3d 749 (June 24, 2025)

Subject area: Class actions

Holding: When ruling on certification of a class, the circuit court may not consider the merits of the claim in determining whether the class has sufficient commonality and typicality.

Vote: 5-2

PROTASIEWICZ (majority opinion), joined by A. BRADLEY, DALLET, HAGEDORN, and KAROFISKY
ZIEGLER (concurring in part and dissenting in part), joined by R. BRADLEY

14. *Wisconsin State Legislature v. Wisconsin Dep't of Pub. Instruction*, 2025 WI 27, 416 Wis. 2d 611, 22 N.W.3d 932 (June 25, 2025)

Subject area: State government

Holding: The Wisconsin Constitution does not authorize the governor to partially veto a non-appropriation bill.

Vote: 7-0

R. BRADLEY (majority opinion for a unanimous Court), joined by A. BRADLEY, ZIEGLER, DALLET, HAGEDORN, KAROFISKY, and PROTASIEWICZ

15. *Service Emps. Int'l Union Health-care Wis. v. Wisconsin Emp. Rels. Comm'n*, 2025 WI 29, 416 Wis. 2d. 688, 22 N.W.3d 876 (June 27, 2025)

Subject area: Collective bargaining

Holding: 2011 Wis. Act 10 removed the University of Wisconsin Hospitals and Clinics Authority, a "public body corporate and politic," from the Employment Peace Act, which covers collective bargaining for private employers.

Vote: 7-0

HAGEDORN (majority opinion), joined by A. BRADLEY, ZIEGLER, R. BRADLEY, DALLET, KAROFISKY, and PROTASIEWICZ
R. BRADLEY (concurrency), joined by ZIEGLER
DALLET (concurrency), joined by A. BRADLEY, KAROFISKY, and PROTASIEWICZ

16. *Kaul v. Urmanski*, 2025 WI 32, ___ Wis. 2d. ___, 22 N.W.3d 740 (July 2, 2025)

Subject area: Abortion

Holding: Comprehensive legislation enacted over the last 50 years resulted in implied repeal of Wisconsin's 1849 law prohibiting abortions.

Vote: 4-3

DALLET (majority opinion), joined by KAROFISKY, A. BRADLEY, and PROTASIEWICZ
KAROFISKY (concurrency)
ZIEGLER (dissent)
R. BRADLEY (dissent)
HAGEDORN (dissent), joined by R. BRADLEY

17. *Planned Parenthood of Wis. v. Urmanski*, 2025 WI 33, ___ Wis. 2d. ___, 23 N.W.3d 483 (July 2, 2025)

Subject Area: Abortion

Holding: Given the decision in *Kaul v. Urmanski*, the court concluded that this original action should be dismissed.

Vote: 7-0

PER CURIAM (order), KAROFISKY, A. BRADLEY, ZIEGLER, R. BRADLEY, DALLET, HAGEDORN, and PROTASIEWICZ
ZIEGLER (concurring), joined by R. BRADLEY

18. *State ex rel. Wis. Dep't of Corr. v. Hayes*, 2025 WI 35, ___ Wis. 2d. ___, 22 N.W.3d 916 (July 3, 2025)

Subject area: Certiorari review

Holding: Under the certiorari standard of review, the administrator's decision to reverse an administrative law judge's revocation of parole for violations of conditions of probation must be upheld because it is supported by substantial evidence and was made according to law.

Vote: 6-1

A. BRADLEY (majority opinion), joined by KAROFISKY, DALLET, HAGEDORN, and PROTASIEWICZ
ZIEGLER (concurrency)
R. BRADLEY (dissent)

19. *Evers v. Marklein*, 2025 WI 36, ___ Wis. 2d. ___, 22 N.W.3d 789 (July 8, 2025)

Subject area: Separation of powers

Holding: Bicameralism and presentment requirements of the Wisconsin Constitution prohibit the Wisconsin Legislature, other than by legislation, from pausing, objecting to, or suspending implementation of rules compliant with all statutory rulemaking requirements.

Vote: 4-3

KAROFISKY (majority opinion), joined by A. BRADLEY, DALLET, and PROTASIEWICZ
HAGEDORN (concurring in part and dissenting in part)
ZIEGLER (dissent), joined by R. BRADLEY

Criminal Law Decisions, 2024-25

1. *State v. Molde*, 2025 WI 21, 416 Wis. 2d 262, 21 N.W.3d 343 (June 13, 2025)

Subject area: Evidence

Holding: Statistical evidence alone on the likelihood of false reports does not violate the *State v. Haseltine* rule prohibiting vouching for credibility of another witness.

Vote: 7-0

HAGEDORN (majority), joined by A. BRADLEY, ZIEGLER, R. BRADLEY, DALLET, KAROFISKY, and PROTASIEWICZ
KAROFISKY (concurrency)

2. *State v. Grady*, 2025 WI 22, 416 Wis. 2d. 283, 21 N.W.3d 353 (June 13, 2025)

Subject area: Evidence

Holding: A circuit court's warning that the defendant's conversation with his lawyer would not be confidential in the Zoom hearing was sufficient under the clearly erroneous standard of review to sustain the circuit court's factual finding that the defendant did not intend the conversation to be confidential.

Vote: 6-1

ZIEGLER (majority opinion), joined by A. BRADLEY, R. BRADLEY, DALLET, HAGEDORN, and KAROFISKY
DALLET (concurrency), joined by A. BRADLEY
PROTASIEWICZ (dissent)

3. *State v. Ramirez*, 2025 WI 28, 416 Wis. 2d. 641, 22 N.W.3d 821 (June 27, 2025)

Subject area: Speedy trial

Holding: A 46-month delay did not violate the defendant's right to a speedy trial.

Vote: 7-0

R. BRADLEY (majority opinion), joined with respect to all parts except ¶ 37 and n.6, by ZIEGLER, DALLET, HAGEDORN, and KAROFISKY, and joined with respect to ¶ 37 and n.6 by ZIEGLER and HAGEDORN
A. BRADLEY (concurrency), joined by PROTASIEWICZ
DALLET (concurrency), joined by KAROFISKY
KAROFISKY (concurrency)

4. *State v. McAdory*, 2025 WI 30, ___ Wis. 2d. ___, 22 N.W.3d 844 (July 1, 2025)

Subject areas: Statutory interpretation, double jeopardy

Holdings: The circuit court may reinstate on remand the charge and guilty verdict for restricted controlled substance (RCS), previously dismissed as required under Wis. Stat. section 346.63(1)(c) as interpreted by *Town of Menasha v. Bastian*, after reversal and dismissal of the operating while under the influence verdict. Reinstating the RCS charge and guilty verdict did not violate the court of appeals' mandate in *McAdory I* or McAdory's right to be free from double jeopardy.

Vote: 7-0

DALLET (majority opinion), joined by KAROFISKY, A. BRADLEY, HAGEDORN, and PROTASIEWICZ
ZIEGLER (concurring in the judgment), joined by R. BRADLEY

5. *State v. Stetzer*, 2025 WI 34, ___ Wis. 2d. ___, 22 N.W.3d 893 (July 3, 2025)

Subject area: Defenses to crimes

Holdings: All elements of the coercion defense must be met for the entire duration of the ongoing, otherwise-criminal act. Evaluating the reasonableness of the defendant's belief in the defense requires considering the defendant's personal history.

Vote: 6-1

DALLET (majority opinion), joined by A. BRADLEY, R. BRADLEY, HAGEDORN, PROTASIEWICZ, and ZIEGLER (except for ¶¶ 4, 24-29, and 39)
ZIEGLER (concurrency)
KAROFISKY (dissent)

Most of the holdings displayed in the table were summarized by Marquette University Law School Professors Daniel D. Blinka and Thomas J. Hammer and were originally published in the Supreme Court Digest that appears in *Wisconsin Lawyer*.

Table compiled by Jay D. Jerde, Mitchell Hamline 2006, legal writer for the State Bar of Wisconsin.
jjerde@wisbar.org **WL**

WEC to appeal to circuit court.⁶⁰

In a 4-3 decision by Justice Karofsky, the supreme court dismissed Brown's appeal for lack of legal standing.⁶¹ It rejected the idea that complainants are always "aggrieved" when the WEC dismisses their allegations of unlawful activity.⁶² Instead, the court held, to be "aggrieved by" an adverse WEC decision, a complainant must show that the "WEC's decision personally affected [the complainant]," such as by showing "that the challenged election activity ... made it more difficult for [the complainant] to vote."⁶³

In dissent, Justice Rebecca Bradley, joined in large part by Justice Hagedorn, argued that the statute's "plain language" applies to complainants who receive unfavorable decisions from the WEC.⁶⁴ She further argued, in a paragraph joined by both Justice Hagedorn and Chief Justice Ziegler, that Brown would also meet the majority's heightened standard because the clerk's "alleged failure to conduct an election in accordance with [state election laws] harmed [Brown's] legal right" "to have local election officials in his area comply with the law."⁶⁵

In another election case, *Wisconsin Elections Commission v. LeMahieu*, the court issued a unanimous decision that allowed WEC administrator Meagan Wolfe to keep her job. The WEC unanimously appointed Wolfe to the elections administrator role in 2018,⁶⁶ and the Republican-controlled Wisconsin State Senate unanimously confirmed her in 2019.⁶⁷ But after the heated 2020 election, which involved unsuccessful efforts to overturn the results of the state's presidential vote, some Republican legislators sought to oust Wolfe.⁶⁸ She declined to resign, and impeachment efforts fizzled.⁶⁹

Wolfe's four-year term expired in July 2023, setting up the confrontation that led to the *LeMahieu* case. When the WEC voted in June 2023 to reappoint Wolfe, the three Democratic WEC appointees abstained, blocking her nomination. This maneuver meant that the senate

could not vote to reject Wolfe's appointment, which would have ended her tenure as administrator. Instead, pursuant to *State ex rel. Kaul v. Prehn*,⁷⁰ a 2022 case in which the court allowed an appointee of former Governor Scott Walker to remain in his position after his term expired, Wolfe has been able to hold over as WEC's administrator despite the expiration of her term.

In *LeMahieu*, several legislators sought mandamus relief, arguing that the WEC was required to appoint a new administrator when Wolfe's term expired.⁷¹ In an opinion by Chief Justice Ziegler, a unanimous court disagreed, concluding that, under *Prehn*, "WEC does not have a duty to appoint a new administrator ... simply because [Wolfe's] term has ended."⁷² Instead, Wolfe can remain in her position as a holdover indefinitely, unless and until the WEC appoints and the senate confirms a new administrator. In a

concurrence, Justice Ann Walsh Bradley, joined by Justice Dallet and Justice Karofsky, criticized the 2022 *Prehn* decision, in which all three of them dissented.⁷³ But no party in *LeMahieu* asked for *Prehn* to be overruled – indeed, they expressly disclaimed that argument – so the result was a unanimous court.⁷⁴

Lastly, in an order in *Kennedy v. Wisconsin Elections Commission*, the court unanimously upheld a lower court's rejection of Robert F. Kennedy Jr.'s efforts to remove himself from Wisconsin's November 2024 presidential election ballot after various deadlines had passed. Citing inadequate appellate briefing from Kennedy, the court affirmed the circuit court's order, which had determined that Kennedy was unlikely to succeed on the merits of his statutory and constitutional challenges and thus was not entitled to a temporary injunction.⁷⁵ The case drew attention to the fact that state law appears to allow

removal of candidates' names from the ballot only if they die.⁷⁶ The ultimate result was that Kennedy's name remained on the ballot, even though he had dropped out of the presidential race.⁷⁷

The Term to Come: 2025-26

There is a new justice on the court in the 2025-26 term. Judge Susan Crawford, who was elected in April 2025 in a race that shattered national judicial campaign-spending records, took her seat in August.⁷⁸ She replaced Justice Ann Walsh Bradley, who retired after serving on the court for 30 years, including a stint as Chief Justice for the last two months of the 2024-25 term.

The court has already accepted more than one dozen cases for review, including ones on due-process and involuntary-medication issues,⁷⁹ police interrogations in schools,⁸⁰ tribal sovereign immunity,⁸¹ and electronic privacy.⁸² But the 2025-26 term is perhaps most notable for what



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will not immediately be on the court's docket: congressional redistricting.

The 2025 supreme court race brought national focus on Wisconsin's U.S. House maps, with supporters of both candidates pointing to a possible congressional redistricting case as a reason to donate or vote.⁸³ In June, however, the court denied two petitions for original actions that sought to challenge those maps.⁸⁴ Two groups have refiled their cases in circuit court, arguing that the state's congressional map is an unconstitutional partisan and anticompetitive gerrymander.⁸⁵ The cases may well end up in the state supreme court eventually but only after first being heard at the trial court level.⁸⁶

Some major cases now pending in the appeals court also could reach the supreme court during its 2025-26 term. These include a state constitutional challenge to 2011 Wis. Act 10, which significantly curtailed collective bargaining rights for public employees⁸⁷; a case on absentee-ballot witness requirements⁸⁸; and a challenge to the longstanding ability of Wisconsin courts to extend voting hours on election day because of emergencies, interruptions, and other special circumstances.⁸⁹ The 2025-26 term may also bring continued debates among the justices over the correct approach to statutory interpretation, including whether the court should

revisit its lead statutory interpretation case, *State ex rel. Kalal v. Circuit Court for Dane County*.⁹⁰

The upcoming term will again take place alongside a state supreme court election, with Justice Rebecca Bradley's seat up for election in April 2026. Regardless of the outcome, liberal-leaning justices will retain a majority on the court, but the race will determine whether that majority grows from four justices to five.

In short, it's sure to be another interesting term for the Wisconsin Supreme Court. **WL**

ENDNOTES

¹This figure excludes attorney and judicial discipline decisions, as well as one case dismissed as improvidently granted and one abortion case, discussed further below, that was dismissed as moot after the court decided *Kaul v. Urmanski*, 2025 WI 32. This figure also includes the court's per curiam order in *Kennedy v. Wisconsin Elections Commission*, 2024 WI 37, 413 Wis. 2d 509, 11 N.W.3d 786.

²Bryna Godar, *Wisconsin Supreme Court: 2023-24 Term Review and 2024-25 Preview*, 97 Wis. Law. 10 (Sept. 2024), <https://www.wisbar.org/NewsPublications/WisconsinLawyer/Pages/Article.aspx?ArticleID=30624&source=carousel>.

³Alan Ball, *The Supreme Court's 2024-25 Term: Some Initial Impressions* (July 15, 2025), <https://scowstats.com/2025/07/15/the-supreme-courts-2024-25-term-some-initial-impressions/>; Alan Ball, *The Supreme Court's 2023-24 Term: Some Initial Impressions* (July 8, 2024), <https://scowstats.com/2024/07/08/the-supreme-courts-2023-24-term-some-initial-impressions/>.

⁴One of these cases was 4-2 with one justice recused. *Morway v. Morway*, 2025 WI 3, 414 Wis. 2d 378, 15 N.W.3d 886. The other was a mixed 4-3 and 5-2 decision in *Evers v. Marklein (Evers II)*, 2025 WI 36, ___ Wis. 2d ___, 22 N.W.3d 789.

⁵See Alan Ball, *Wisconsin Supreme Court Statistics, 2023-24* (July 18, 2024), <https://scowstats.com/2024/07/18/wisconsin-supreme-court-statistics-2023-24/>; Alan Ball, *Wisconsin Supreme Court Statistics, 2022-23* (July 24, 2023), <https://scowstats.com/2023/07/24/wisconsin-supreme-court-statistics-2022-23/>; Alan Ball, *Wisconsin Supreme Court Statistics, 2021-22* (July 21, 2022), <https://scowstats.com/2022/07/21/wisconsin-supreme-court-statistics-2021-22/>; Alan Ball, *Wisconsin Supreme Court Statistics, 2020-21* (July 26, 2021), <https://scowstats.com/2021/07/26/wisconsin-supreme-court-statistics-2020-21/>; Alan Ball, *Wisconsin Supreme Court Statistics, 2019-20* (July 23, 2020), <https://scowstats.com/2020/07/23/wisconsin-supreme-court-statistics-2019-20/>.

⁶*Kaul v. Urmanski*, 2025 WI 32, ___ Wis. 2d ___, 22 N.W.3d 740.

⁷*Dobbs v. Jackson Women's Health Org.*, 597 U.S. 215 (2022).

⁸Wis. Stat. § 940.04.

⁹*Urmanski*, 2025 WI 32, ¶ 2, ___ Wis. 2d ___.

¹⁰*Id.* ¶ 10.

¹¹*Id.* ¶¶ 24-25.

¹²The 2024-25 term was unique in that three different justices had stints as chief justice. Justice Annette Ziegler's term as chief ended in April. Justice Ann Walsh Bradley then assumed the role from May 1 to June 30, the last two months of her 30 years on the court. Upon Justice Bradley's retirement, Justice Karofsky assumed the role July 1. Several opinions were released in early July. For those opinions, Chief Justice Karofsky is listed with her new title. For earlier opinions, she is referred to as "Justice." Justice Ann Walsh Bradley and Justice Annette Ziegler are referred to as "Justice" or "Chief

Justice" depending on their status when an opinion was issued.

¹³*Urmanski*, 2025 WI 32, ¶¶ 38, 54, 58, ___ Wis. 2d ___.

¹⁴*Id.* ¶ 73 (R.G. Bradley, J., dissenting).

¹⁵*Id.* ¶ 70 (Ziegler, J., dissenting).

¹⁶*Id.* ¶ 106 (Hagedorn, J., dissenting).

¹⁷*Id.* ¶ 160; *id.* ¶¶ 77-78 (R.G. Bradley, J., dissenting); *id.* ¶ 68 (Ziegler, J., dissenting).

¹⁸*Order, Planned Parenthood of Wis. v. Urmanski*, 2025 WI 33 (July 2, 2025). At the outset of the *Kaul v. Urmanski* case in the supreme court, the court also declined to address whether the state constitution contains a right to obtain a consensual medical abortion.

¹⁹Richard Briffault, *The Item Veto in State Courts*, 66 Temple L. Rev. 1171, 1185, 1194-95 (1993); Derek Clinger & Miriam Seifter, *White Paper: Unpacking State Legislative Vetoes*, State Democracy Research Initiative 16 (Oct. 13, 2023), <https://statedemocracy.law.wisc.edu/featured/2023/white-paper-unpacking-state-legislative-vetoes/>.

²⁰*Lemieux v. Evers*, 2025 WI 12, 415 Wis. 2d 422, 19 N.W.3d 76.

²¹Scott Bauer, *Wisconsin Governor's 400-Year Veto Angers Opponents in State with Long History of Creative Cuts*, Associated Press (July 6, 2023), <https://apnews.com/article/evers-veto-400-years-wisconsin-school-funding-67a7847e4a24ea86f7d16123356f770d>.

²²See *id.*; Richard A. Champagne, Staci Duros & Madeline Kasper, *The Wisconsin Governor's Partial Veto after Bartlett v. Evers*, Legis. Reference Bureau (July 2020), https://docs.legis.wisconsin.gov/misc/lrb/reading_the_constitution/governors_partial_veto_5_3.pdf.

²³*Bartlett v. Evers*, 2020 WI 68, 393 Wis. 2d 172, 945 N.W.2d 685.

²⁴Champagne et al., *supra* note 22.

²⁵*Lemieux*, 2025 WI 12, ¶ 12, 415 Wis. 2d 422 (quoting *State ex rel. Wis. Tel. Co. v. Henry*, 218 Wis. 302, 314-15, 260 N.W. 486 (1935)).

²⁶*Id.* (quoting *State ex rel. Wis. Senate v. Thompson*, 144 Wis. 2d 429, 451-53, 424 N.W.2d 385 (1988)).

²⁷Wis. Const. art. V, § 10(1)(c).

²⁸*Lemieux*, 2025 WI 12, ¶ 27, 415 Wis. 2d 422.

²⁹*Id.* ¶¶ 22-23 (Karofsky, J., lead opinion). This portion of Justice Karofsky's opinion was only joined by Justice Ann Walsh Bradley and Justice Janet Protasiewicz. In a concurrence, Justice Dallet also rejected the petitioners' alternate argument, but she wrote separately because she had a different understanding of the argument and why it should be rejected. *Id.* ¶¶ 32, 35-40 (Dallet, J., concurring). The court also noted that its most recent partial veto case, *Bartlett*, 2020 WI 68, 393 Wis. 2d 172, "did not establish any precedent" because "there was no majority opinion." *Lemieux*, 2025 WI 12, ¶ 12 n.3, 415 Wis. 2d 422. A majority in *Bartlett* struck down several partial vetoes that would have survived under prior precedents, but the justices could not agree on a rationale. *Bartlett*, 2020 WI 68, ¶ 9, 393 Wis. 2d 172.

³⁰*Lemieux*, 2025 WI 12, ¶ 40, 415 Wis. 2d 422 (Dallet, J., concurring).



³¹*Id.* ¶ 92 (Hagedorn, J., dissenting).

³²*Wisconsin State Legislature v. Wisconsin Dep't of Pub. Instruc-tion (DPI)*, 2025 WI 27, 416 Wis. 2d 611, 22 N.W.3d 932.

³³*Id.* ¶ 25.

³⁴*Id.* ¶ 26.

³⁵Derek Clinger, *Explainer: Wisconsin Supreme Court Set to Consider Fate of "Mini Legislature,"* State Democracy Research Initiative (March 25, 2025), <https://statedemocracy.law.wisc.edu/featured/2025/explainer-wisconsin-supreme-court-set-to-consider-fate-of-mini-legislature/>.

³⁶*DPI*, 2025 WI 27, ¶ 36, 416 Wis. 2d 611.

³⁷See 2025 Wis. Act 15, § 20.865(4).

³⁸*Evers v. Marklein (Evers II)*, 2025 WI 36, ___ Wis. 2d ___, 22 N.W.3d 789.

³⁹*Evers v. Marklein (Evers I)*, 2024 WI 31, 412 Wis. 2d 525, 5 N.W.3d 395.

⁴⁰*Evers II*, 2025 WI 36, ¶ 1, ___ Wis. 2d ___.

⁴¹*Immigration & Naturalization Serv. v. Chadha*, 462 U.S. 919, 952 (1983).

⁴²*Evers II*, 2025 WI 36, ¶ 39, ___ Wis. 2d ___.

⁴³*Id.* ¶ 41.

⁴⁴*Martinez v. Department of Indus., Lab. & Hum. Rels.*, 165 Wis. 2d 687, 699, 478 N.W.2d 582 (1992).

⁴⁵*Service Emps. Int'l Union (SEIU) Loc. 1 v. Vos*, 2020 WI 67, ¶ 98, 393 Wis. 2d 38, 946 N.W.2d 35.

⁴⁶*Evers II*, 2025 WI 36, ¶ 36, ___ Wis. 2d ___ (“Adopting the reasoning in *Chadha* means we must overrule *Martinez*, and paragraphs 12 and 80-83 of *SEIU* which expressly rely upon *Martinez*.”).

⁴⁷*Id.* ¶ 61 (Hagedorn, J., concurring in part, dissenting in part).

⁴⁸*Id.* ¶ 46. Justice Hagedorn also would have resolved the chal-lenge to the conversion therapy ban on narrow grounds, conclud-ing the challenge is moot because the rule has been in effect since April 2024. *Id.* ¶ 59.

⁴⁹See *id.* ¶ 74 (Ziegler, J., dissenting); *id.* ¶¶ 77, 91 (R.G. Bradley, J., dissenting).

⁵⁰*Id.* ¶¶ 77-78 (R.G. Bradley, J., dissenting).

⁵¹*Id.*

⁵²*Kaul v. Wisconsin State Legislature*, 2025 WI 23, 416 Wis. 2d 322, 21 N.W.3d 513.

⁵³*Id.* ¶ 1.

⁵⁴*SEIU*, 2020 WI 67, ¶ 10, 393 Wis. 2d 38.

⁵⁵2025 WI 23, ¶ 2, 416 Wis. 2d 322.

⁵⁶*Id.* ¶ 3.

⁵⁷*Brown v. Wisconsin Elections Comm'n*, 2025 WI 5, 414 Wis. 2d 601, 16 N.W.3d 619.

⁵⁸*Id.* ¶¶ 5-8.

⁵⁹*Id.* ¶ 8.

⁶⁰Wis. Stat. § 5.06(8).

⁶¹*Brown*, 2025 WI 5, ¶ 26, 414 Wis. 2d 601.

⁶²*Id.* ¶¶ 18-24.

⁶³*Id.* ¶ 16.

⁶⁴*Id.* ¶¶ 40, 47 (R.G. Bradley, J., dissenting).

⁶⁵*Id.* ¶ 43.

⁶⁶Patrick Marley, *Wisconsin Elections Commission Names New Leader*, Milwaukee J.-Sentinel (Mar. 3, 2018).

⁶⁷*Wisconsin Senate Confirms Wolfe as Elections Leader*, As-sociated Press (May 15, 2019, 11:41 AM CDT), <https://apnews.com/wisconsin-senate-confirms-wolfe-as-elections-leader-b4bc-cfd41176481e9904cca342fe7a79>.

⁶⁸Harm Venhuizen, *Top Wisconsin Senate Republican Calls on Assembly to Impeach State's Top Elections Official*, Associated Press (Oct. 4, 2023, 12:28 PM CDT), <https://apnews.com/article/wisconsin-legislature-elections-meagan-wolfe-impeachment-7c2ac388d47e03e40d019b14266cf913>.

⁶⁹See *Kapenga Presses Vos to Advance Wolfe Impeachment Resolution*, WisPolitics (Dec. 5, 2023, 12:35 PM), <https://www.wispolitics.com/2023/kapenga-presses-vos-to-advance-wolfe-impeachment-resolution/>.

⁷⁰*State ex rel. Kaul v. Prehn*, 2022 WI 50, 492 Wis. 2d 539, 976 N.W.2d 821.

⁷¹*Wisconsin Elections Comm'n v. LeMahieu*, 2025 WI 4, ¶ 2, 414 Wis. 2d 571, 16 N.W.3d 469.

⁷²*Id.* ¶ 3.

⁷³*Id.* ¶¶ 32-36 (A.W. Bradley, J., concurring).

⁷⁴*Id.* ¶ 34.

⁷⁵Order, *Kennedy v. Wisconsin Elections Comm'n*, 2024 WI 37, at 5 (Sept. 27, 2024).

⁷⁶*Id.* at 1-2.

⁷⁷Alexander Shur, *Wisconsin Clerks Relieved After High Court Keeps RFK Jr. on Ballot*, Wis. Watch (Oct. 1, 2024), <https://wisconsinwatch.org/2024/10/wisconsin-rfk-kennedy-ballot-supreme-court-election-clerk-republican-democrat/>.

⁷⁸Anya Van Wagtendonk, *Susan Crawford Wins Wisconsin Supreme Court Race as Democrats Take Stand Against Donald Trump, Elon Musk*, WPR (Apr. 1, 2025), <https://www.wpr.org/news/susan-crawford-wins-wisconsin-supreme-court-race-democrats-elon-musk>.

⁷⁹*State v. J.D.B.*, 2024 WI App 61, 414 Wis. 2d 108, 13 N.W.3d 525, petition for review granted, No. 2023AP715 (Feb. 12, 2025); *State v. N.K.B.*, 2024 WI App 63, 414 Wis. 2d 218, 14 N.W.3d 681, petition for review granted, No. 2023AP722 (Feb. 12, 2025); *Sheboygan Cnty. v. N.A.L. (In re Commitment of N.A.L.)*, No. 2024AP1195, 2025 WL 409087 (Wis. Ct. App. Feb. 5, 2025) (unpublished), petition for review granted, No. 2024AP1195 (May 21, 2025).

⁸⁰*State v. K.R.C. (In Int. of K.R.C.)*, No. 2023AP2102, 2024 WL 4615758 (Wis. Ct. App. Oct. 30, 2024) (unpublished), petition for review granted, No. 2023AP2102 (March 13, 2025).

⁸¹Certification by Wisconsin Court of Appeals, *Legend Lake Prop-erty Owners Ass'n Inc. v. Keshena*, No. 2022AP937 (Jan. 22, 2025), certification granted, No. 2022AP937 (March 13, 2025).

⁸²*State v. Gasper*, 2024 WI App 72, petition for review granted, No. 2023AP2319 (March 13, 2025); Certification by Wisconsin Court of Appeals, *State v. Rauch Sharak*, No. 2024AP469 (Jan. 16, 2025), certification granted, No. 2024AP469 (March 13, 2025).

⁸³Lawrence Andrea, *Supreme Court Race Puts Spotlight on Congressional Maps as GOP Files Complaint Against Crawford*, Milwaukee J.-Sentinel (Feb. 26, 2025, 6:15 PM CT), <https://www.jsonline.com/story/news/politics/elections/2025/02/26/gop-files-complaint-against-susan-crawford-on-congressional-maps-is-sue/80273638007/>; Joe Schulz, *Elon Musk Says Wisconsin Supreme Court Race Could Affect the 'Entire Destiny of Humanity'*, WPR (Mar. 31, 2025, 8:33 AM), <https://www.wpr.org/news/elon-musk-wisconsin-supreme-court-race-green-bay-visit-million-dollar-checks>.

⁸⁴Rich Kremer & Anya Van Wagtendonk, *Unpacking the Wis-consin Supreme Court's Rejection of Congressional Redistricting Lawsuits*, WPR (June 27, 2025, 11:55 AM), <https://www.wpr.org/news/unpacking-wisconsin-supreme-court-rejection-congressional-redistricting-lawsuits>.

⁸⁵Scott Bauer, *New Lawsuit Seeks to Redraw Wisconsin's Con-gressional Maps Before 2026 Midterms*, Associated Press (July 9, 2025, 4:46 PM CDT), <https://apnews.com/article/wisconsin-con-gress-redistricting-lawsuit-13e483d2ffa83ba6a1c64ea9489eb857>. Complaint, *Wisconsin Bus. Leaders for Democracy v. Wisconsin Elec. Comm'n*, No. 2025CV2252 (July 8, 2025); Complaint, *Bothfeld v. Wisconsin Elec. Comm'n*, No. 2025CV2432, at 5 (July 21, 2025).

⁸⁶The plaintiffs have asked the state supreme court to appoint a three-judge panel to hear the case pursuant to a state statute that establishes a special litigation process for apportionment cases. See Complaint, *Wisconsin Bus. Leaders for Democracy v. Wisconsin Elec. Comm'n*, No. 2025CV2252, at 2-3 (July 8, 2025); Complaint, *Bothfeld v. Wisconsin Elec. Comm'n*, No. 2025CV2432, at 5 (July 21, 2025); Wis. Stat. § 751.035(1).

⁸⁷*Abbotsford Educ. Ass'n v. Wisconsin Emp. Rels. Comm'n*, No. 2023CV3152 (Wis. Cir. Ct. Dec. 2, 2024), appeal docketed, No. 2024AP2429 (Wis. Ct. App. Dec. 2, 2024).

⁸⁸*League of Women Voters of Wis. v. Wisconsin Elections Comm'n*, No. 2022CV2472 (Wis. Cir. Ct. Jan. 2, 2024), appeal dock-eted, No. 2024AP166 (Wis. Ct. App. Jan. 31, 2024).

⁸⁹*Democratic Nat'l Comm. v. Boehm*, No. 2024CV730 (Wis. Cir. Ct. Nov. 5, 2024), appeal docketed, No. 2024AP2484 (Wis. Ct. App. Dec. 9, 2024).

⁹⁰*State ex rel. Kaul v. Circuit Ct. for Dane Cnty.*, 2004 WI 58, 271 Wis. 2d 633, 681 N.W.2d 110. For more on the debate dur-ing the 2024-25 term, see *Service Employees International Union Healthcare Wisconsin v. Wisconsin Employment Relations Com-mission*, 2025 WI 29, ¶ 51, 416 Wis. 2d 688, 22 N.W.3d 876 (Dallet, J., concurring) (noting that “although a majority of the court joins [the concurring] opinion, it does not overrule *Kaul*, or purport to bind our court or any other to use any particular methodology when interpreting statutes in the future”); *id.* ¶ 36 (R.G. Bradley, J., concurring) (arguing that Justice Dallet’s approach would “unmoor the judiciary from the rule of law”). **WL**