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December 2, 2022

Hon. Deborah S. Hunt  
Clerk of Court  
United States Court of Appeals for the Sixth Circuit  
540 Potter Stewart U.S. Courthouse  
100 E. Fifth Street  
Cincinnati, Ohio 45202-3988

RE: *Timothy King, et al., v. Gretchen Whitmer, et al.*, No. 21-1786  
FRAP 28(j) citation of supplemental authorities for Oral Argument on  
December 8, 2022, before the Hon. Danny J. Boggs, the Hon. Helene N.  
White, and the Hon. Raymond M. Kethledge.

Dear Ms. Hunt:

Yesterday, the district court in Arizona ordered sanctions against  
lawyers under Rule 11 and Section 1927, citing *King v. Whitmer. Lake v.*  
*Hobbs*, No. CV-22-00677-PHX-JJT, 2022 WL 17351715 (D. Ariz. Dec. 01, 2022).

Respectfully,

*/s/ Sidney Powell*  
Sidney Powell