

**STATE OF MICHIGAN
IN THE SUPREME COURT**

AMERICAN CIVIL LIBERTIES UNION OF
MICHIGAN
and PETER ARMSTRONG, SR.,

Plaintiffs-Appellants,

v

CITY OF GRAND RAPIDS,
Defendant-Appellee.

Supreme Court No. 169571

Court of Appeals No. 373417

Kent County Circuit Court
No. 23-008846-CZ

**MOTION OF RITA WILLIAMS, EDITOR OF CLUTCH JUSTICE,
FOR LEAVE TO FILE BRIEF AMICUS CURIAE**

Rita Williams, founder and editor of Clutch Justice, appearing in propria persona, moves under MCR 7.312(H) for leave to file the accompanying brief amicus curiae. In support, movant states:

1. Movant is the founder and editor of Clutch Justice, an independent, Michigan-focused accountability journalism publication, and files in her own name. Clutch Justice reports on Michigan courts, prosecutors, and local governments, and it relies on public records, including records requested under the Freedom of Information Act (FOIA), MCL 15.231 *et seq.*

2. Movant is not a party to this action. The authorship and funding statements required by MCR 7.312(H)(5) appear in the first footnote of the proposed brief.

3. Movant is not within any category exempt from the motion requirement under MCR 7.312(H)(2), so this motion is required. MCR 7.312(H)(1). It is filed with the proposed brief.

4. By order of July 10, 2026, this Court directed oral argument on the application and asked the parties to address (a) whether FOIA requires a public body to fulfill a request within a reasonable time; (b) whether fulfillment thirteen months after payment of the good-faith deposit was reasonable; and (c) whether fulfillment mooted the case. The order allowed supplemental briefs from amici curiae who appeared at the application stage. Movant did not appear at that stage and now moves for leave under MCR 7.312(H).

5. Movant's brief will assist the Court. It addresses each of the Court's three questions from the position of a small, independent publication, for which delay is felt as the loss of a record's accountability value once the event it concerns has passed. It argues that MCL 15.234(8) supports a context-dependent reasonableness standard, with the public body's own estimate as the benchmark. It does not ask the Court to adopt a fixed number of days.

6. Other amici curiae have appeared in this matter, including Bridge Michigan and the other amici joining its brief, and Dr. Alexander Yiannopoulos. Movant has drawn its brief narrowly to avoid repeating what those amici and the parties have presented.

7. This motion and the proposed brief are filed within the time permitted by MCR 7.312(H)(4)(b). Movant does not request oral argument and understands that, under MCR 7.312(H)(6), it may argue only if the Court so orders.

WHEREFORE, movant Rita Williams asks the Court to grant leave to file the accompanying brief amicus curiae.

Respectfully submitted,

/s/ Rita Williams
Rita Williams
Editor, Clutch Justice
Amicus Curiae, appearing in propria persona
Richland, MI 49083
hello@clutchjustice.com

Dated: October 23, 2026

CERTIFICATE OF SERVICE

I certify that on October 23, 2026, I filed the foregoing motion and the accompanying proposed brief amicus curiae through the MiFILE electronic filing system, which serves registered counsel of record, and that I served a copy by email on every person on the service list for this case, including:

Miriam J. Aukerman (P63165), Robert M. Riley (P72290), Benjamin J. VanderWerp (P84614), and Lauren E. Babbage (P85816), counsel for plaintiff-appellant American Civil Liberties Union of Michigan;

Bonsitu A. Kitaba-Gaviglio (P78822), counsel for plaintiff-appellant Peter Armstrong, Sr.;

Elizabeth J. Fossel (P41430), Sarah J. Hartman (P71458), and Kendall R. O'Connor (P84036), counsel for defendant-appellee City of Grand Rapids;

H. William Burdett, Jr. (P63185), counsel for amicus curiae Bridge Michigan; and

Dr. Alexander Yiannopoulos, amicus curiae.

/s/ Rita Williams
Rita Williams