

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

JUDICIAL WATCH, INC.,

Plaintiff,

v.

NORTH CAROLINA; THE NORTH CAROLINA STATE BOARD OF ELECTIONS; KAREN BRINSON BELL, in her capacity as the Executive Director of the North Carolina State Board of Elections; THE MECKLENBURG COUNTY BOARD OF ELECTIONS; MICHAEL G. DICKERSON, in his official capacity as the Director of Elections for Mecklenburg County; CAROL HILL WILLIAMS, in her capacity as the Chair of the Mecklenburg County Board of Elections; THE GUILFORD COUNTY BOARD OF ELECTIONS; CHARLIE COLLICUTT, in his official capacity as Director of Elections for Guilford County; and HORACE KIMEL, JR., in his capacity as Chair of the Guilford County Board of Elections,

Defendants, and

THE LEAGUE OF WOMEN VOTERS OF NORTH CAROLINA AND THE NORTH CAROLINA A. PHILIP RANDOLPH INSTITUTE,

Proposed Defendant-Intervenors.

Civil Action No. 3:20-cv-211

THE LEAGUE OF WOMEN VOTERS OF NORTH CAROLINA AND THE NORTH CAROLINA A. PHILIP RANDOLPH'S MOTION TO INTERVENE AS DEFENDANTS

Pursuant to Federal Rule of Civil Procedure 24, the League of Women Voters of North Carolina and the North Carolina A. Philip Randolph Institute (“Defendant-Intervenors”)

respectfully submit this motion, by and through undersigned counsel, to intervene as Defendants in the above-captioned case as of right or, in the alternative, with the Court's permission.

As set forth in the accompanying memorandum in support of the motion to intervene, Defendant-Intervenors oppose any requested court-ordered purging of voting rolls in North Carolina, including Guilford County and Mecklenburg County, and will seek a judgment on the pleadings in favor of Defendants on Count I of the Complaint. As required by Federal Rule of Civil Procedure 24(c), a proposed Answer setting forth this defense is attached hereto as Exhibit 1. No such court-ordered "list maintenance" is appropriate under—much less required by—the National Voter Registration Act of 1993 ("NVRA"), a federal statute designed to make it *easier* for citizens to become and remain registered to vote.

Proposed Defendant-Intervenors conferred with counsel for Plaintiff and Defendants on April 20 and 21, 2020. Plaintiff does not consent to the motion to intervene. Defendants Mecklenburg County Board of Elections, Michael G. Dickerson, and Carol Hill Williams consent to the motion to intervene. Defendants Guilford County Board of Elections, Charlie Collicutt, and Horace Kimel, Jr. do not object to the motion to intervene. Proposed Defendant-Intervenors consulted with counsel for the State Defendants, but counsel for the State Defendants was not able to ascertain their clients' position before filing. Counsel for State Defendants indicated an intention to file a statement of position shortly.

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Dated: April 21, 2020.

Respectfully submitted,

/s/ Allison Riggs

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**Pro hac vice application forthcoming*

CERTIFICATE OF SERVICE

I certify that on the 21st day of April, 2020 the foregoing THE LEAGUE OF WOMEN VOTERS OF NORTH CAROLINA AND THE NORTH CAROLINA A. PHILIP RANDOLPH INSTITUTE'S MOTION TO INTERVENE AS DEFENDANTS AS TO COUNT I and accompanying exhibits was filed via the Court's CM/ECF filing system, which will send a notification of filing to all counsels of record as indicated in the attached Service List. Counsel for Defendants Mecklenburg County Board of Elections, Michael G. Dickerson, and Carol Hill Williams has agreed to accept service by electronic mail on behalf of these defendants for this motion, and was served with the aforementioned documents via electronic mail as indicated in the attached Service List. Plaintiff's Counsel H. Christopher Coates has agreed to accept service by electronic mail and was served with the aforementioned documents via electronic mail as indicated in the attached Service List.

/s/ Allison J. Riggs
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