

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

A. PHILIP RANDOLPH INSTITUTE OF  
OHIO *et al.*,

Plaintiffs,

v.

FRANK LAROSE, in his official capacity as  
Secretary of State of Ohio,

Defendant.

Civil Action No. 1:20-cv-01908

Judge Dan Aaron Polster

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**MOTION TO INTERVENE OF DONALD J. TRUMP FOR PRESIDENT, INC.,  
THE OHIO REPUBLICAN PARTY, THE REPUBLICAN NATIONAL COMMITTEE,  
AND THE NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE**

Pursuant to Federal Rule of Civil Procedure 24, Donald J. Trump for President, Inc., the Ohio Republican Party, the Republican National Committee, and the National Republican Congressional Committee (the “Republican Committees”) move for leave to intervene as party defendants. Intervention is warranted for the reasons set forth in the accompanying memorandum in support. In addition, as required by Rule 24(c), the Republican Committees have attached a proposed Answer to Plaintiffs’ Complaint.

Dated: September 10, 2020

Respectfully submitted,

s/ Christopher M. McLaughlin

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*Attorneys for Proposed Intervenor-  
Defendants*

*\*Pro hac vice application forthcoming*

**CERTIFICATE OF SERVICE**

I certify that on September 10, 2020, a copy of the foregoing Motion to Intervene was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

*s/ Christopher M. McLaughlin*  

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*Attorney for Proposed Intervenor-Defendants*