

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

DEMOCRACY NORTH CAROLINA, THE LEAGUE OF WOMEN VOTERS OF NORTH CAROLINA, DONNA PERMAR, JOHN P. CLARK, MARGARET B. CATES, LELIA BENTLEY, REGINA WHITNEY EDWARDS, ROBERT K. PRIDDY II, WALTER HUTCHINS, AND SUSAN SCHAFFER,

Plaintiffs,

v.

THE NORTH CAROLINA STATE BOARD OF ELECTIONS; DAMON CIRCOSTA, in his official capacity as Chair of the State Board of Elections; STELLA ANDERSON, in her official capacity as Secretary of the State Board of Elections; KEN RAYMOND, in his official capacity as Member of the State Board of Elections; JEFF CARMON III, in his official capacity as Member of the State Board of Elections; DAVID C. BLACK, in his official capacity as Member of the State Board of Elections; KAREN BRINSON BELL, in her official capacity as Executive Director of the State Board of Elections; THE NORTH CAROLINA DEPARTMENT OF TRANSPORTATION; J. ERIC BOYETTE, in his official capacity as Transportation Secretary; THE NORTH CAROLINA DEPARTMENT OF HEALTH AND HUMAN SERVICES; MANDY COHEN, in her official capacity as Secretary of Health and Human Services,

Defendants,

and

PHILIP E. BERGER, in his official capacity as President Pro Tempore of the North Carolina Senate, and TIMOTHY K. MOORE, in his official capacity as Speaker of the North Carolina House of Representatives,

Intervenors,

Civil Action No. 20-cv-00457

and

REPUBLICAN NATIONAL COMMITTEE,
NATIONAL REPUBLICAN SENATORIAL
COMMITTEE, NATIONAL REPUBLICAN
CONGRESSIONAL COMMITTEE, and NORTH
CAROLINA REPUBLICAN PARTY,

*Proposed Republican
Committee Intervenors.*

REPUBLICAN COMMITTEES' MOTION TO INTERVENE

Proposed Intervenor-Defendants the Republican National Committee (“RNC”), National Republican Senatorial Committee (“NRSC”), National Republican Congressional Committee (“NRCC”), and North Carolina Republican Party (“NCRP”) (collectively the “Republican Committees”) move to intervene in the above-captioned case pursuant to Rule 24 of the Federal Rules of Civil Procedure in order to oppose Plaintiffs’ challenges to North Carolina election law. The Republican Committees respectfully request that the motion be granted for the reasons stated in the accompanying memorandum in support of this motion and accompanying Declarations from each of the proposed Intervenors.

The Republican Committees also request that their motion be granted expedited consideration to ensure they can participate as parties in the preliminary injunction proceedings. Plaintiffs filed their preliminary injunction motion on June 5, 2020, and requested expedited consideration. *See* Doc. 9 at 7. Today, the Court entered an Order with a briefing schedule, which requires that briefs in opposition to Plaintiffs’ anticipated amended motion for preliminary injunction be filed by Friday, June 26 (Dkt. No. 29). The Republican Committees seek intervention into the case so that they can be heard as full parties in opposition to Plaintiffs’ motion. Accordingly, the Proposed Republican Committee Intervenors request that their motion be

considered on an expedited basis that allows them to participate fully as parties in the preliminary injunction proceedings.

Dated: June 18, 2020

Respectfully submitted,

/s/ R. Scott Tobin
R. Scott Tobin (N.C. Bar No. 34317)
Taylor English Duma LLP
4208 Six Forks Road, Suite 1000
Raleigh, North Carolina 27609
Telephone: (404) 640-5951
Email: stobin@taylorenghish.com

Bobby R. Burchfield (*pro hac vice pending*)
Matthew M. Leland (*pro hac vice pending*)
King & Spalding LLP
1700 Pennsylvania Avenue, N.W.
Suite 200
Washington, D.C. 20006
Telephone: (202) 626-5524
bburchfield@kslaw.com
mleland@kslaw.com

Counsel for the Republican Committees

CERTIFICATE OF SERVICE

I certify that on the 18th day of June, 2020, the foregoing Motion to Intervene, Memorandum and Declarations in Support of Motion to Intervene, and Answer was electronically served and filed with the Clerk of the Court using the CM/ECF system.

/s/ R. Scott Tobin
R. Scott Tobin