

United States District Court  
for the Western District of Virginia  
Lynchburg Division

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**League of Women Voters of Virginia; Katherine D. Crowley; Erikka Goff; and Seijra Toogood,,**

*Plaintiffs,*

v.

**Virginia State Board of Elections; Robert H. Brink, John O’Bannon, and Jamilah D. Lecruise,** in their official capacities as Chairman, Vice-Chair, and Secretary of the Virginia State Board of Elections, respectively; and **Christopher E. Piper,** in his official capacity as Commissioner of the Virginia Department Of Elections,

*Defendants.*

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**Civ. No. 6:20-cv-00024**

**Motion to Intervene**

**MOTION TO INTERVENE**

Pursuant to Fed. R. Civ. P. 24, Sheila DeLappe Ferguson, Sandy Burchett, and Diane Crickenberger (collectively “the Voters”) move to intervene as Defendants to Plaintiffs’ *Complaint for Injunctive and Declaratory Relief*:

Virginia law requires that absentee voters, *inter alia*, open and mark their ballots in the presence of a witness. Va. Code § 24.2-707(A). And that voters enclose their ballots in the provided envelope, seal the envelope, and “fill in and sign the statement printed on the back of the envelope in the presence of a witness, who shall sign the same envelope[.]” *Id.* Plaintiffs seek to eliminate these witness requirements.

The requested relief violates Voters’ fundamental right to vote. Specifically, the requested relief violates: (1) controlling legislation and strips vital safeguards against voting fraud, (2) the right to vote under the *Purcell* principle, and (3) the Voters’ right to have, and to



**Certificate of Service**

I hereby certify that the foregoing document was served electronically on April 23, 2020, upon the following counsel via the United States District Court for the Western District of Virginia, electronic filing system:

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