

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION**

LEAGUE OF WOMEN VOTERS OF  
VIRGINIA, *et al.*,

Plaintiffs,

v.

VIRGINIA STATE BOARD OF  
ELECTIONS, *et al.*,

Defendants.

Case No.: 6:20-cv-00024-NKM

**MOTION TO INTERVENE OF THE  
REPUBLICAN PARTY OF VIRGINIA,  
VICKI BURNS, VINCE FALTER,  
MILDRED H. SCOTT, AND THOMAS  
TURNER**

NOW COMES the Republican Party of Virginia, Inc. (“**RPV**”), MG Vincent E. Falter, USA (ret), Mildred H. Scott, and Thomas N. Turner, Jr. (collectively, “**Applicants**”), by counsel, and respectfully move this Court to intervene in this case pursuant to Rules 24(a)(2) and 24(b) of the Federal Rules of Civil Procedure. This motion is accompanied by a Memorandum of Points and Authorities that explains why Applicants are entitled to intervene in this case of right and are also entitled to permissive intervention. Applicants respectfully request that the Court grant intervention.

Applicants’ counsel contacted counsel for the parties seeking their consent on this motion. Counsel for Plaintiffs and Defendants both indicated their opposition to Applicants’ intervention.

In conformance with Federal Rule of Civil Procedure 24(c), a proposed Answer is attached as Exhibit A to this motion, and a proposed order is attached as Exhibit B.

Dated: April 24, 2020

Respectfully submitted,

/s/ Christopher M. Marston  
Christopher M. Marston (VSB No. 65703)  
chris@2562group.com  
2652 GROUP LLC  
P.O. Box 26141  
Alexandria, VA 22313-6141  
571.482.6790 / Fax 703.997.2549

Trevor M. Stanley (VSB No. 77351)  
E. Mark Braden (pro hac vice pending)  
Katherine L. McKnight (adm. pending)  
Richard Raile (VSB No. 84340)  
BAKER & HOSTETLER LLP  
Washington Square, Suite 1100  
1050 Connecticut Avenue, N.W.  
Washington, DC 20036-5403  
202.861.1500 / Fax 202.861.1783  
tstanley@bakerlaw.com  
mbraden@bakerlaw.com  
kmcknight@bakerlaw.com  
rraile@bakerlaw.com

Patrick T. Lewis (pro hac vice pending)  
BAKER & HOSTETLER LLP  
127 Public Square, Suite 2000  
Cleveland, OH 44114-1214  
216.621.0200 / Fax 216.696.0740  
plewis@bakerlaw.com

*Counsel for Proposed Intervenors*

**CERTIFICATE OF SERVICE**

I certify that on April 24, 2020, the foregoing was filed on the Court's electronic case filing system. Notice of the filing was generated by the Court's electronic system. Copies of the filing are available on that system.

/s/ Christopher M. Marston  
Christopher M. Marston (VSB No. 65703)