

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

No. 5:20-cv-507-D

TIMOTHY K. MOORE, et al.,	)
	)
Plaintiffs,	)
	)
v.	)
	)
DAMON CIRCOSTA, et al.,	)
	)
Defendants, and	)
	)
DEMOCRACY NORTH CAROLINA, THE	)
LEAGUE OF WOMEN VOTERS OF NORTH	)
CAROLINA, LELIA BENTLEY, MARGARET	)
B. CATES, ROBERT K. PRIDDY II, REGINA	)
WHITNEY EDWARDS, JOHN P. CLARK, and	)
WALTER HUTCHINS,	)
	)
Proposed Intervenor-Defendants.	)

**MOTION TO INTERVENE AS DEFENDANTS**

Pursuant to Federal Rule of Civil Procedure 24, the League of Women Voters of North Carolina, Democracy North Carolina, Lelia Bentley, Peggy Cates, Robert K. Priddy, Regina Whitney Edwards, John P. Clark, and Walter Hutchins (“proposed Intervenor-Defendants”) respectfully submit this Motion to Intervene as Defendants in this action of right or, in the alternative, with permission of the Court. A proposed order is attached to this Motion as Exhibit 1.

As set forth in the accompanying Memorandum in Support of Motion to Intervene as Defendants, proposed Intervenor-Defendants seek to dismiss Plaintiff’s Complaint and oppose any requested court-ordered injunction regarding Numbered Memo 2020-19. Pursuant to Rule 24(c),

this Motion is accompanied by a proposed Motion to Dismiss and Memorandum in Support of Motion to Dismiss as Exhibits 2-3 setting forth the defenses for which intervention is sought.

Respectfully submitted this the 1st day of October, 2020,

/s/ Jon Sherman

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\*Application to appear *pro hac vice* forthcoming.

## CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of October, 2020, I caused the foregoing MOTION TO INTERVENE and accompanying Exhibits to be filed electronically with the Clerk of Court through the CM/ECF System for filing, and served on counsel registered to receive CM/ECF notifications in this case.

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