

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

PATSY J. WISE, et al.,)	
)	
Plaintiffs,)	
)	
v.)	1:20-cv-00912
)	
THE NORTH CAROLINA STATE BOARD OF)	
ELECTIONS, 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, Margaret (Peggy) B. 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 Plaintiffs’ 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 5th day of October, 2020,

/s/ Jon Sherman

Jon Sherman
D.C. Bar No. 998271
Michelle Kanter Cohen
D.C. Bar No. 989164
Cecilia Aguilera
D.C. Bar No. 1617884
FAIR ELECTIONS CENTER
1825 K St. NW, Ste. 450
Washington, D.C. 20006
Telephone: (202) 331-0114
Email: jsherman@fairelectionscenter.org
mkantercohen@fairelectionscenter.org
caguilera@fairelectionscenter.org

/s/ Allison J. Riggs

Allison J. Riggs (State Bar #40028)
Jeffrey Loperfido (State Bar #52939)
Hilary Klein (State Bar #53711)
Southern Coalition for Social Justice
1415 West Highway 54, Suite 101
Durham, NC 27707
Telephone: 919-323-3380
Facsimile: 919-323-3942
Email: Allison@southerncoalition.org
jeff@southerncoalition.org

/s/ George P. Varghese

George P. Varghese (Pa. Bar No. 94329)
Joseph J. Yu (NY Bar No. 4765392)
Stephanie Lin (MA Bar No. 690909)
Rebecca Lee (DC Bar No. 229651)
WILMER CUTLER PICKERING HALE AND DORR
LLP
60 State Street
Boston, MA 02109
Telephone: (617) 526-6000
Facsimile: (617) 526-5000
Email:
george.varghese@wilmerhale.com
joseph.yu@wilmerhale.com
stephanie.lin@wilmerhale.com
rebecca.lee@wilmerhale.com

Counsel for Proposed Intervenor-Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 5th 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.

/s/ George P. Varghese
George P. Varghese