

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

THE NEW GEORGIA PROJECT;  
BLACK VOTERS MATTER FUND;  
and RISE, INC.,

*Plaintiffs,*

v.

BRAD RAFFENSPERGER, in his official capacity as the Georgia Secretary of State; REBECCA SULLIVAN, in her official capacity as the Vice Chair of the Georgia State Election Board; DAVID WORLEY, in his official capacity as a member of the Georgia State Election Board; MATTHEW MASHBURN, in his official capacity as a member of the Georgia State Election Board; and ANH LE, in her official capacity as a member of the Georgia State Election Board,

*Defendants,*

REPUBLICAN NATIONAL COMMITTEE; NATIONAL REPUBLICAN SENATORIAL COMMITTEE; NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE; and GEORGIA REPUBLICAN PARTY,

*Proposed Intervenor-Defendants.*

No. 1:21-cv-1229-JPB

**NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE'S MOTION TO INTERVENE AND JOINDER OF MEMORANDUM OF LAW (DOC. 6-1) AND PROPOSED ANSWER (DOC. 6-2)**

The National Republican Congressional Committee (“NRCC”) respectfully moves to intervene as a defendant in this case. Last week, three Republican Party entities filed their intervention papers. *See* Doc. 6. The NRCC, another Republican Party entity, is a national political committee that works to elect Republicans to the United States House of Representatives. For the same reasons in the other movants’ Memorandum of Law, the NRCC should be granted intervention. The NRCC (with the other movants’ consent) joins their Memorandum of Law (Doc. 6-1) and their Proposed Answer (Doc. 6-2), and adopts those filings as its own. While Plaintiffs oppose the NRCC’s intervention, they do not oppose the NRCC joining the other movants’ papers. Defendants take no position on intervention but do not oppose the NRCC’s joinder.

Allowing the NRCC to join the pending filings—and adding it to this case—will prejudice no one. The NRCC is represented by the same counsel as the other Republican Party movants. If allowed to intervene, the four Republican Party movants will file briefs, present arguments, and otherwise litigate as one unit. Additionally, this case is still in its infancy, as Plaintiffs have not yet responded to the original motion to intervene. Moreover, all four Republican Party entities will soon move to intervene in the three related cases: *Asian Americans Advancing Justice Atlanta v. Raffensperger*, No. 1:21-cv-1333-JPB (N.D. Ga.); *Sixth District of African Methodist Episcopal Church v. Kemp*, No. 1:21-cv-1284-JPB (N.D. Ga.); and *Georgia State Conference of the NAACP v. Raffensperger*, No. 1:21-cv-1259-JPB (N.D. Ga.). Since some or all

of those cases will likely be consolidated with this one, there is no purpose in excluding the NRCC from this particular case.

This 9th day of April, 2021.

Respectfully submitted,

/s/ William Bradley Carver, Sr.

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**CERTIFICATE OF SERVICE AND CERTIFICATE  
OF COMPLIANCE WITH LOCAL RULE 5.1**

The foregoing was prepared in Century Schoolbook font, 13-point type, one of the font and point selections approved by the Court in N.D. Ga. L.R. 5.1(C). I hereby certify that I electronically filed the foregoing **NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE'S MOTION TO INTERVENE AND JOINDER OF MEMORANDUM OF LAW (DOC. 6-1) AND PROPOSED ANSWER (DOC. 6-2)** with the Clerk of Court using CM/ECF electronic filing system, which will automatically send e-mail notification of such filing to the following counsel of record and serve as follows:

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This 9th day of April, 2021.

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