

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF FLORIDA  
TALLAHASSEE DIVISION**

HARRIET TUBMAN FREEDOM  
FIGHTERS, CORP., and HEAD  
COUNT, INC.,

*Plaintiffs,*

v.

LAUREL LEE, in her official capacity as  
Secretary of State of Florida, and ASH-  
LEY MOODY, in her official capacity as  
Florida Attorney General,

*Defendants,*

REPUBLICAN NATIONAL  
COMMITTEE and NATIONAL  
REPUBLICAN SENATORIAL  
COMMITTEE,

*Proposed Intervenor-Defendants.*

No. 4:21-cv-242-MW-MAF

**MOTION TO INTERVENE**

Movants—the Republican National Committee and National Republican Senatorial Committee—seek to intervene as defendants in this case. Attached is a memorandum of law that explains why Movants are entitled to intervention as of right under Rule 24(a)(2) and to permissive intervention under Rule 24(b). For all those reasons, Movants respectfully ask the Court to grant this motion. Plaintiffs oppose. Defendants do not object to Movants’ intervention.

Dated: June 25, 2021

Respectfully submitted,

Tyler Green\*  
Cameron T. Norris\*  
Steven C. Begakis\*  
Daniel Shapiro  
Fla. Bar No. 1011108  
CONSOVOY MCCARTHY PLLC  
1600 Wilson Blvd., Ste. 700  
Arlington, VA 22209  
(703) 243-9423  
tyler@consovoymccarthy.com  
cam@consovoymccarthy.com  
steven@consovoymccarthy.com  
daniel@consovoymccarthy.com

/s/ Daniel E. Nordby  
Daniel E. Nordby  
Fla. Bar No. 14588  
Benjamin J. Gibson  
Fla. Bar No. 58661  
George N. Meros, Jr.  
Fla. Bar No. 263321  
Amber Stoner Nunnally  
Fla. Bar No. 109281  
SHUTTS & BOWEN LLP  
215 South Monroe Street, Suite 804  
Tallahassee, Florida 32301  
Tel: (850) 241-1717  
dnordby@shutts.com  
bgibson@shutts.com  
gmeros@shutts.com  
anunnally@shutts.com  
mmontanaro@shutts.com

\**pro hac vice* forthcoming

*Counsel for Proposed Intervenor-Defendants Republican National Committee  
and National Republican Senatorial Committee*

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(B)**

Counsel for Movants conferred with counsel for Plaintiffs and Defendants who have appeared regarding this motion. Plaintiffs oppose. Defendants do not object to Movants' intervention.

/s/ Daniel E. Nordby

**CERTIFICATE OF SERVICE**

I certify that on June 25, 2021, I electronically filed this document with the Clerk of the Court by using the CM/ECF system, which will serve all parties whose counsel have entered appearances. Those parties who have not yet appeared will be served via email.

/s/ Daniel E. Nordby