## UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA Atlanta Division

UNITED STATES OF AMERICA,	
Plaintiff,	
v.	Case No. 1:21-cv-02575-JPB
THE STATE OF GEORGIA; THE GEORGIA STATE BOARD; and BRAD RAFFENSPERGER, in his official capacity as the Georgia Secretary of State,	
Defendants,	
PUBLIC INTEREST LEGAL FOUNDATION,	
Proposed Intervenor-Defendant.	

## PUBLIC INTEREST LEGAL FOUNDATION'S <u>MOTION TO INTERVENE</u>

The Public Interest Legal Foundation ("Foundation"), by and through

undersigned counsel, respectfully moves this Court for leave to intervene as a

Defendant as a matter of right under Rule 24(a)(2) of the Federal Rules of Civil

Procedure, or, in the alternative, permissively under Rule 24(b)(1). Pursuant to

Federal Rule of Civil Procedure 24, the Foundation's proposed responsive filing is

attached to this Motion. A memorandum in support of this Motion is also attached.

Defendants have not yet entered an appearance in this matter. Plaintiff's

counsel was contacted to request consent to this Motion, but no response was

received prior to filing.

Respectfully Submitted, this 2nd day of July, 2021.

<u>/s/ Harry W. MacDougald</u> (Ga. # 463076) Counsel of Record CALDWELL, CARLSON, ELLIOTT & DELOACH, LLP Two Ravinia Drive, Suite 1600 Atlanta, GA 30346 (404) 843-1956 hmacdougald@ccedlaw..com

Kaylan L. Phillips (Ind. # 30405-84)\* J. Christian Adams (Va. Bar #42543)\* Maureen S. Riordan (NY Bar 2058840)\* Public Interest Legal Foundation 32 E. Washington St., Suite 1675 Indianapolis, Indiana 46204 (317) 203-5599 (888) 815-5641 (facsimile) kphillips@publicinterstlegal.org \*Motion for admission *pro hac vice* forthcoming

## **RULE 5.1 CERTIFICATE**

The undersigned certifies that the foregoing document was prepared in 14-

point Times New Roman font and in accordance with the margin and other

requirements of Local Rule 5.1.

<u>s/ Harry W. MacDougald</u> Harry W. MacDougald Georgia Bar No. 463076

## **CERTIFICATE OF SERVICE**

This is to certify that I have on this day e-filed the foregoing *Public Interest* 

Legal Foundation's Motion to Intervene with the Clerk of Court using the

CM/ECF system, which will send an email notification of such filing to counsel of record:

This 2nd day of July, 2021.

/s/ Harry W. MacDougald Harry W. MacDougald Georgia Bar No. 463076

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