UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

UNITED STATES OF AMERICA, Plaintiff,	
V.	No. 1:21-cv-2575-JPB
THE STATE OF GEORGIA	
and THE GEORGIA STATE	
ELECTION BOARD,	
Defendants,	
REPUBLICAN NATIONAL	
COMMITTEE; NATIONAL REPUB-	
LICAN SENATORIAL COMMITTEE;	
and GEORGIA REPUBLICAN	
PARTY, INC.,	
Proposed Intervenor-Defendants.	

UNOPPOSED MOTION TO INTERVENE & COMBINED MEMORANDUM OF LAW

Movants—the Republican National Committee, National Republican Senatorial Committee, and Georgia Republican Party, Inc.—respectfully move to intervene in this case under Rule 24(b). Movants' request for permissive intervention is unopposed: Plaintiff consents to it, and Defendants will take no position. As in *Coalition for Good Governance v. Raffensperger*, "permissive intervention is appropriate because plaintiffs do not contest that Proposed Intervenors' defenses share a common question of law or fact with the current action, and allowing Proposed Intervenors to join the action at this early stage of the litigation will not cause undue delay or burden." Order, No. 1:21-cv-2070-

JPB (N.D. Ga. June 21, 2021).*

Dated: July 6, 2021

Respectfully submitted,

Tyler Green* Cameron T. Norris* Steven C. Begakis* CONSOVOY MCCARTHY PLLC 1600 Wilson Blvd., Ste. 700 Arlington, VA 22209 (703) 243-9423 tyler@consovoymccarthy.com cam@consovoymccarthy.com steven@consovoymccarthy.com

*pro hac vice forthcoming

<u>/s/ William Bradley Carver</u> John E. Hall, Jr. Georgia Bar No. 319090 William Bradley Carver, Sr. Georgia Bar No. 115529 Alex B. Kaufman Georgia Bar No. 136097 James Cullen Evans Georgia Bar No. 797018 **HALL BOOTH SMITH, P.C.** 191 Peachtree Street NE Suite 2900 Atlanta, GA 30303 (404) 954-6967 bcarver@hallboothsmith.com

Counsel for Proposed Intervenor-Defendants

^{*} For similar reasons, this Court granted Movants permissive intervention in all the other cases challenging SB 202: *The New Ga. Project v. Raffensperger*, No. 1:21-cv-1229-JPB; *Ga. State Conf. of the NAACP v. Raffensperger*, No. 1:21-cv-1259-JPB; *Sixth Dist. of the African Methodist Episcopal Church v. Kemp*, No. 1:21-cv-1284-JPB; *Asian Am. Advancing Justice-Atlanta v. Raffensperger*, No. 1:21-cv-1333-JPB; *VoteAmerica v. Raffensperger*, No. 1:21-cv-1390-JPB; *The Concerned Black Clergy of Metro. Atlanta, Inc. v. Raffensperger*, No. 1:21-cv-1728-JPB.

CERTIFICATE OF COMPLIANCE

I certify that this document complies with Local Rule 5.1(B) because it uses 13-point Century Schoolbook font.

/s/ William Bradley Carver

CERTIFICATE OF SERVICE

On July 6, 2021, I e-filed this document on ECF, which will serve everyone requiring service.

/s/ William Bradley Carver_