

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

SIXTH DISTRICT OF THE AFRICAN  
METHODIST EPISCOPAL CHURCH,  
*et al.*,

*Plaintiffs,*

UNITED STATES OF AMERICA,

*Proposed Intervenor-  
Plaintiff*

v.

BRIAN KEMP, Governor of the State  
of Georgia, in his official capacity, *et  
al.*,

*Defendants.*

REPUBLICAN NATIONAL  
COMMITTEE, *et al.*,

*Intervenor-Defendants.*

IN RE GEORGIA SENATE BILL 202

Civil Action No.  
1:21-CV-01284-JPB

Master Case No.  
1:21-MI-55555-JPB

**UNITED STATES' MOTION TO INTERVENE**

Under Rule 24 of the Federal Rules of Civil Procedure, the United States

respectfully moves to intervene in this lawsuit as Plaintiff-Intervenor. Fed. R. Civ. P. 24(a)(1). Rule 24 provides for intervention either as of right or by permission. Here, the United States has a statutory right to intervene under Section 902 of the Civil Rights Act of 1964. 42 U.S.C. § 2000h-2. Section 902 grants the United States an unconditional right to intervene in certain cases seeking relief from the alleged denial of equal protection of the laws based on race under the Fourteen Amendment if the Attorney General certifies, as he has here, that the case is one of general public importance. *Id.*

Accompanying this motion are a memorandum in support, the Attorney General's certification, the United States' proposed Complaint in Intervention, and a proposed order.

For the reasons set forth in the attached Memorandum in Support, the Court should grant the United States' motion.

Dated: February 6, 2024

RYAN K. BUCHANAN  
United States Attorney  
Northern District of Georgia

/s/ Aileen Bell Hughes  
AILEEN BELL HUGHES  
Georgia Bar No. 375505

Respectfully submitted,

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/s/ J. Eric Rich  
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**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(D)**

Pursuant to Local Rule 7.1(D), I certify that the foregoing document was prepared in Times New Roman 14-point font in compliance with Local Rule 5.1(C).

*/s/ John A. Russ IV*  
JOHN A. RUSS IV  
Attorney, Voting Section  
Civil Rights Division  
U.S. Department of Justice

### CERTIFICATE OF SERVICE

I hereby certify that on February 6, 2024, I electronically filed the foregoing with the clerk of the court using the CM/ECF system, which will send notification of this filing to counsel of record.

*/s/ John A. Russ IV*

JOHN A. RUSS IV

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