IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

VASU ABHIRAMAN, TERESA K. CRAWFORD, LORETTA MIRANDOLA, JENNIFER MOSBACHER, ANITA TUCKER, ESSENCE JOHNSON, LAUREN WAITS, SUZANNE WAKEFIELD, MICHELLE AU, JASMINE CLARK, DEMOCRATIC NATIONAL COMMITTEE, and DEMOCRATIC PARTY OF GEORGIA, INC.,

Petitioners,

v.

STATE ELECTION BOARD,

Defendant,

REPUBLICATION NATIONAL COMMITTEE AND GEORGIA REPUBLICAN PARTY, INC.,

Applicants for Intervention.

Civil Case No. # 24CV010786

MOTION TO INTERVENE BY THE REPUBLICAN NATIONAL COMMITTEE AND GEORGIA REPUBLICAN PARTY

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INTRODUCTION

The Republican National Committee (RNC) and the Georgia Republican Party, Inc. (GAGOP) move to intervene as defendants under O.C.G.A. §9-11-24. The Petitioners do not oppose this motion.

Petitioners filed suit to challenge the administration of Georgia elections. As the principal national and state committees of the Republican Party, the RNC and GAGOP have interests in this case that are not adequately represented without their involvement. And as the mirror image of the Democratic National Committee and Democratic Party of Georgia, two of the Petitioners here, the RNC and GAGOP are uniquely positioned to represent the other side of this case. Movants are thus entitled to intervention as of right under O.C.G.A. §9-11-24(a)(2). Alternatively, this Court should grant Movants permissive intervention because their defense and the main action will share common questions of law and fact, and intervention would not unduly burden any party.

Applying a nearly identical intervention rule, federal courts often allow the RNC and GAGOP to intervene in election-law cases. In fact, in recent challenges to Georgia's election laws, the Northern District of Georgia has always allowed political committees to intervene to protect their interests in the rules affecting Georgia's elections.[1]

[1] *E.g.*, *Int'l All. of Theater Stage Emps. Local 927 v. Lindsey*, Doc. 84, No. 1:23-cv-4929 (N.D. Ga. May 3, 2024) (granting intervention to the RNC and GAGOP); *United States v. Georgia*, Minute Order, No. 1:21-cv-2575 (N.D. Ga. July 12, 2021) (granting intervention to the RNC, NRSC, NRCC, and GAGOP); *Coal. for Good Governance v. Raffensperger*, Minute Order, No. 1:21-cv-2070 (N.D. Ga. June 21, 2021); *New Ga. Project v. Raffensperger*, Doc. 39, No. 1:21-cv-1333 (N.D. Ga. June 4, 2021); *Concerned Black Clergy of Metro. Atlanta v. Raffensperger*, Minute Order, No. 1:21-cv-1728 (N.D. Ga. June 21, 2021); *Sixth Dist. of the African Methodist Episcopal Church v. Kemp*, Minute Order, No. 1:21-cv-1284 (N.D. Ga. June 4, 2021); *Ga. State Conf. of NAACP v. Raffensperger*, Doc. 40, No. 1:21-cv-1259 (N.D. Ga. June 4, 2021); *Vote Am. v. Raffensperger*, Doc. 50, No. 1:21-cv-1390 (N.D. Ga. June 4, 2021); *Asian Ams. Advancing Justice-Atlanta v. Kemp*, Doc. 39, No. 1:21-cv-1284 (N.D. Ga. June 4, 2021); *Wood v. Raffensperger*, Doc. 14, No. 1:20-cv-5155 (N.D. Ga. Dec. 28, 2020) (order granting intervention to the Democratic Party of Georgia and the DSCC); *Black Voters Matter Fund v. Raffensperger*, Doc. 42, No. 1:20-cv-4869 (N.D. Ga. Dec. 9, 2020).

Movants are unaware of any ruling in the Northern District of Georgia denying any political party intervention in a case challenging state election law. That's unsurprising, as political parties "brin[g] a unique perspective" to these cases, which is why courts routinely let them intervene "in actions challenging voting laws." *Democratic Party of Va. v. Brink*, 2022 WL 330183, at *2 (E.D. Va. Feb. 3, 2022).[2] The RNC and GAGOP should thus be allowed to intervene as defendants.

Movants attach with this motion their Answer to the Petition. The Answer sets forth the defense for which intervention is sought in accordance with O.C.G.A. §9-11-24(c), specifically that the Petition fails to state a claim upon which relief can be granted and should therefore be dismissed under O.C.G.A §9-11-12(b)(6).

ARGUMENT

I. The RNC and GAGOP are entitled to intervene as of right.

Applicants "shall be permitted to intervene" when they file a "timely application" claiming "an interest relating to the property or transaction which is the subject matter of the action," and they are "so situated that the disposition of the action may as a

[2] *E.g.*, *La Union del Pueblo Entero v. Abbott*, 29 F.4th 299, 309 (5th Cir. 2022) (reversing the district court's denial of the Republican committee's motion to intervene as of right); *League of Women Voters of Ohio v. LaRose*, Doc. 25, No. 1:23-cv-2414 (N.D. Ohio Feb. 6, 2024) (granting intervention to RNC and Ohio GOP); *Mont. Pub. Int. Rsch. Grp. v. Jacobsen*, Doc. 34, No. 6:23-cv-70 (D. Mont. Jan. 18, 2024) (granting intervention to RNC and Montana GOP); *Vote.org v. Byrd*, Doc. 85, No. 4:23-cv-111 (N.D. Fla. May 26, 2023); *RNC v. Chapman*, 447 M.D. 2022 (Pa. Common. Ct. Sept. 29, 2022) (granting intervention to various Democratic political committees); *DNC v. Hobbs*, Doc. 18, No. 2:22-cv-1369 (D. Ariz. Aug. 24, 2022); *Mi Familia Vota v. Hobbs*, Doc. 53, No. 2:21-cv-1423 (D. Ariz. Oct. 4, 2021); *League of Women Voters of Fla. v. Lee*, Doc. 72, No. 4:21-cv-186 (N.D. Fla. June 4, 2021); *Swenson v. Bostelmann*, Doc. 38, No. 20-cv-459 (W.D. Wis. June 23, 2020); *DNC v. Bostelmann*, 2020 WL 1505640, at *5 (W.D. Wis. Mar. 28, 2020); *Gear v. Knudson*, Doc. 58, No. 3:20-cv-278 (W.D. Wis. Mar. 31, 2020); *Pavek v. Simon*, Doc. 96, No. 19-cv-3000 (D. Minn. July 12, 2020); *Ariz. Democratic Party v. Hobbs*, Doc. 60, No. 2:20-cv-01143 (D. Ariz. June 26, 2020); *League of Women Voters of Minn. Ed. Fund v. Simon*, Doc. 52, No. 20-cv-1205 (D. Minn. June 23, 2020); *Nielsen v. DeSantis*, Doc. 101, No. 4:20-cv-236 (N.D. Fla. May 28, 2020); *Priorities USA v. Nessel*, 2020 WL 2615504, at *5 (E.D. Mich. May 22, 2020); *Thomas v. Andino*, 2020 WL 2306615, at *4 (D.S.C. May 8, 2020).

practical matter impair or impede [their] ability to protect that interest," unless their "interest is adequately represented by existing parties." O.C.G.A. §9-11-24(a)(2). Accordingly, intervention by right has four requirements: "(1) interest, (2) potential impairment, and (3) inadequate representation," all presented in a "timely application." *Buckler v. DeKalb Cty.*, 290 Ga. App. 190, 193 (2008) (quoting *DeKalb Cty. v. Post Props.*, 245 Ga. 214, 219 (1980)). When a prospective party meets these requirements, the court must permit intervention. *See* O.C.G.A. §9-11-24(a) (stating that any movant "*shall* be permitted to intervene" when the requirements are met). Movants satisfy all four requirements for intervention as of right.

A. This motion is timely.

Movants filed their motion rapidly. Petitioners filed their lawsuit on August 26, 2024, and no Defendant has appeared in this case yet. The timeliness of intervention is committed to the Court's discretion. *Henry Cnty. Sch. Dist. v. Home Depot U. S. A., Inc.*, 348 Ga. App. 723, 725 (2019). And Georgia courts have found much later motions to be timely. *E.g.*, *Liberty Mut. Fire Ins. v. Quiroga-Saenz*, 343 Ga. App. 494, 499 (2017) (intervention was timely when the intervenor "waited a month after hiring counsel to move to intervene"); *Stephens v. McGarrity*, 290 Ga. App. 755, 758 (2008) (trial court abused its discretion in finding that motion to intervene was untimely when the intervenor moved three weeks after learning of a proposed settlement in the case, and before the hearing on the settlement). In fact, "in certain cases intervention is proper even after judgment." *AC Corp. v. Myree*, 221 Ga. App. 513, 515 (1996). The motion is timely.

Nor will Movants' intervention prejudice the parties. *AC Corp.*, 221 Ga. App. at 515. This litigation has not yet begun in earnest. No party has filed any briefs or dispositive motions, Defendants have not filed any responsive pleadings, and this Court has

not issued any substantive rulings. Movants will comply with all deadlines that govern the parties, will work to prevent duplicative briefing, and will coordinate with the parties on discovery. If Movants are not allowed to intervene, however, their interests could be irreparably harmed by an order overriding Georgia's election rules and undermining the integrity of Georgia's elections. There are no unusual circumstances. Movants are filing at the earliest possible opportunity. Their motion is timely.

B. Movants have interests related to this action.

Movants have direct interests in the core subject matter of this case: how the State conducts and certifies elections. Movants seek the election of members of the Republican Party, and they have "a direct and substantial interest in the proceedings" because they "affect the [Movants'] ability to participate in and maintain the integrity of the election process in [Georgia]." *La Union del Pueblo Entero v. Abbott*, 29 F.4th 299, 306 (5th Cir. 2022). Rules like the one Petitioners challenge here serve "the integrity of [the] election process," *Eu v. S.F. Cty. Democratic Cent. Comm.*, 489 U.S. 214, 231 (1989), and the "orderly administration" of elections, *Crawford v. Marion Cty. Election Bd.*, 553 U.S. 181, 196 (2008) (op. of Stevens, J.). This is particularly important because voters are more likely to vote and more likely to trust the outcome of the elections when voters see that elections are safe and secure. Federal courts thus "routinely" find that political parties have interests that support intervention in litigation regarding election rules. *Issa v. Newsom*, 2020 WL 3074351, at *3 (E.D. Cal. June 10, 2020); *see also Siegel v. LePore*, 234 F.3d 1163, 1169 n.1 (11th Cir. 2001).

Movants also have a particularized interest in protecting the rights of their members, voters, and candidates. As the Democratic Party has previously explained in this State, organizations like Movants "have specific interests and concerns" in laws

governing elections "from their overall electoral prospects to the most efficient use of their limited resources," which are distinct from the State Defendant's interests. *See Wood v. Raffensperger*, Doc. 13 at 16, No. 1:20-cv-5155 (N.D. Ga. Dec. 21, 2020). Courts often hold that political parties have legally protectable interests in defending challenged state election laws. *E.g.*, *La Union del Pueblo Entero*, 29 F.4th at 306 (granting intervention by right where RNC and local Republican committees had interests in defending challenge to election law); *Bost v. Ill. State Bd. of Elections*, 75 F.4th 682, 687 (7th Cir. 2023) (holding that state Democratic Party had an interest in a challenge to a state election law). As the DNC recently argued to this Court, "the DNC is regularly permitted to intervene as of right in suits regarding states' election procedures." Democratic National Committee's and Democratic Party of Georgia's Renewed Joint Motion to Intervene at 4, *Adams v. Fulton County Board of Elections and Registration*, No. 24-cv-6566 (Ga. Super. Ct. June 14, 2024) ((citing *Paher v. Cegavske*, 2020 WL 2042365, at *3 (D. Nev. Apr. 28, 2020); *Issa*, 2020 WL 3074351, at *4).

Moreover, Movants' interests are the mirror image of Petitioners'. The DNC claims "a core interest in ensuring proper and legal administration of elections, counting of ballots, and certification of results." Pet. 10. So does the RNC. The Democratic Party of Georgia claims a similar interest in "electing [its] candidates in the state and protecting Georgians' voting rights." Pet. 11. So does the GAGOP. Petitioners claim those interests are harmed "when votes for Democratic candidates are not timely certified." Pet. 11. But Movants claim those same interests are harmed by certification of inaccurate election results, and by lawsuits that upend the administration of Georgia elections. As the DNC and DPG's "direct counterparts," the RNC and GAGOP are "uniquely qualified to represent the 'mirror-image' interests." *DNC v. Bostelmann*, 2020 WL

1505640, at *5 (W.D. Wis. Mar. 28, 2020) (granting intervention to RNC and Republican Party of Wisconsin).

The State Election Board's composition reflects this partisan balance. State law gives "the state executive committee of each political party" the right to "nominate a member of its party to serve as a member of the State Election Board." Ga. Code §21-2-30(c). Under that statutory authority, the Republican Party nominated Dr. Janice Johnston to serve on the State Election Board. She has been serving in that position since March 2, 2022. Petitioners object to the fact that the "board's three Republican members voted in favor" of the rules, while the chairman and "Democratic member" opposed the rules. Pet. ¶¶82, 95. Intervenors not only defend the rule, but they also have a unique interest in defending the vote of Dr. Johnston as the Republican member of the board.

C. Disposition of this action will potentially impair Movants' interests.

Going forward without Movants would "impair" their interests. O.C.G.A. §9-11-24(a)(2). Movants do not need to establish that their interests *will* be impaired. *See Brumfield v. Dodd*, 749 F.3d 339, 344 (5th Cir. 2014). Rather, the statute requires only that the case "*may* as a practical matter impair or impede [the Movants'] ability to protect [their] interest." O.C.G.A. §9-11-24(a)(2) (emphasis added). This language mirrors the federal rule and is "obviously designed to liberalize the right to intervene." *Nuesse v. Camp*, 385 F.2d 694, 701 (D.C. Cir. 1967).

Here, Movants' interests will plainly "suffer if the Government were to lose this case, or to settle it against [Movants'] interests." *Mausolf v. Babbitt*, 85 F.3d 1295, 1302-03 (8th Cir. 1996). Not only would an adverse decision undercut rules that protect voters and candidates (including Movants' members), *Frank v. Walker*, 768 F.3d 744, 751

(7th Cir. 2014), but it would also "change the entire election landscape for [Movants'] members and volunteers," thereby "chang[ing] what [Movants'] must do to prepare for upcoming elections," *La Union*, 29 F.4th at 307; *see also Shays v. FEC*, 414 F.3d 76, 90 (D.C. Cir. 2005). That alone satisfies the impaired interest requirement. *La Union*, 29 F.4th at 307; *Shays*, 414 F.3d at 85-86.

The "practical" approach to impairment is particularly important in ensuring accurate election results. The State Election Board's amendment to Rule 183-1-12-.02 requires election superintendents to "attest, after reasonable inquiry that the tabulation and canvassing of the election are complete and accurate and that the results are a true and accurate accounting of all votes cast in that election," when certifying election results. The Petitioners' requested declaratory relief threatens Movants' interests in election integrity, voter turnout, and transparent election administration. And it would require them to reallocate scarce resources, such as election observers, to mitigate the harm.

Finally, because the November 2024 election will occur only once, Movants are "not assured of an opportunity" to defend their interests "in any future action." *Liberty Mut. Fire Ins.*, 343 Ga. App. at 500. This Court's decision could be the final word on the laws governing the next election. Because the "very purpose of intervention is to allow interested parties to air their views … before making potentially adverse decisions," *Brumfield*, 749 F.3d at 345, the "best" course is to give "all parties with a real stake in [the] controversy … an opportunity to be heard." *Hodgson v. UMWA*, 473 F.2d 118, 130 (D.C. Cir. 1972). That includes Movants.

D. Movants are not adequately represented by the Defendants.

No party adequately represents Movants' interest in electing Republican candidates and turning out Republican voters. As courts have explained, private parties' interests in elections are "different in kind from the public interests" of state officials. *La Union del Pueblo Entero*, 29 F.4th at 308. Whereas the State Election Board's interests are defined by its statutory duties to conduct the election process and declare election results, Movants' interests lie in their members, voters, and candidates. While Georgia courts sometimes "assume[] that the intervenor's interests are adequately represented" when "the interest of the intervenor is identical to that of a governmental body or officer," *DeKalb Cnty. v. Post Props.*, 245 Ga. 214, 219 (1980), by its own terms that test "applies only when the interests of the governmental body and the [intervenor] are identical," *Cleland v. Gwinnett Cnty.*, 226 Ga. App. 636, 638 (1997). And when Movants "may be expected to vindicate different points of view" from the government, such as the partisan effects of the rule, or the impact on Movants' candidates and members, courts should not "presume a full overlap of interests." *Berger v. N. Carolina State Conf. of the NAACP*, 597 U.S. 179, 197 (2022).

To begin with, the State doesn't even share Movants' interests, let alone adequately represent them. The State Defendants necessarily represent "the public interest," rather than Movants "particular interest[s]" in protecting their resources and the rights of their candidates and voters. *Coal. of Ariz./N.M. Counties for Stable Economic Growth v. DOI*, 100 F.3d 837, 845 (10th Cir. 1996). For that reason, courts "often conclude[] that governmental entities do not adequately represent the interests of aspiring Movants." *Fund for Animals, Inc. v. Norton*, 322 F.3d 728, 736 (D.C. Cir. 2003).

That's especially true in election litigation. While the Secretary of State has publicly criticized the State Election Board's decision, *see* Pet. ¶85, Intervenors defend it.

And the State has no interest in the election of Movants' candidates, the mobilization of Movants' voters, or the costs associated with either. Instead, as state officials acting on behalf of all Georgia citizens and the State itself, the State Defendants must consider "a range of interests likely to diverge from those of the intervenors." *Meek v. Metro. Dade Cty.*, 985 F.2d 1471, 1478 (11th Cir. 1993). Those clashing interests include the interests of Petitioners, *In re Sierra Club*, 945 F.2d 776, 779-80 (4th Cir. 1991), "the expense of defending the current [laws] out of [state] coffers," *Clark v. Putnam Cnty.*, 168 F.3d 458, 461 (11th Cir. 1999), and the "the social and political divisiveness of the election issue" to the State, *Meek*, 985 F.2d at 1478. But "[i]f allowed to intervene," the Movants "will focus on defending the law vigorously on the merits without an eye to crosscutting administrative concerns." *Berger*, 597 U.S. at 197.

At a minimum, Movants will balance the partisan scales of this lawsuit, giving the Court the benefit of both major political parties' views. *See Mi Familia Vota v. Hobbs*, Doc. 50, No. 2:21-cv-1423 (D. Ariz. Sept. 24, 2021) (excluding "the Democratic Committees" while allowing "the Proposed Republican Intervenors ... to intervene" would violate "both the standards applicable to permissive intervention and principles of equity"). Both political parties have a right to nominate a member to the State Election Board. Ga. Code §21-2-30(c). In a case filed by one major political party challenging the legitimacy of the board's rules, the other major political party has a right to participate. The Court should thus grant the motion to intervene as of right.

II. Alternatively, Movants are entitled to permissive intervention.

Even if this Court were to find that Movants are not entitled to intervene as of right, this Court should still grant permissive intervention "[w]hen an applicant's claim or defense and the main action have a question of law or fact in common." O.C.G.A.

§9-11-24(b)(2). If Movants clear that low bar, the Court must also "consider whether the intervention will unduly delay or prejudice the adjudication of the rights of the original parties." *Id.*

The requirements of paragraph (b)(2) are met here. As explained in Section I, this motion is timely. And Movants will raise defenses that share common questions with the parties' claims and defenses. Petitioners allege that the State Election Board's reasonable-inquiry rule and examination rule are invalid. Movants reject those allegations.

Movants' involvement will not delay the adjudication of this case or prejudice any party. Movants filed this motion just days after Petitioners filed this case, and the Court has neither held hearings nor set a timeline at this early stage in the litigation. Movants are prepared to proceed according to any schedule the Court establishes for adjudicating this case. "[A]llowing intervention by Movants will not unduly delay or prejudice the adjudication of [Petitioners'] claims" when the "litigation is in a relatively nascent stage and none of the deadlines" in a forthcoming scheduling order have passed. *Ga. Aquarium, Inc. v. Pritzker*, 309 F.R.D. 680, 691 (N.D. Ga. 2014). At this early stage, "[w]hatever additional burdens adding the [Movants] to this case may pose, those burdens fall well within the bounds of everyday case management." *Berger*, 597 U.S. at 200. After all, Petitioners "can hardly be said to be prejudiced by having to prove a lawsuit [they] chose to initiate." *Security Ins. Co. of Hartford v. Schipporeit, Inc.*, 69 F.3d 1377, 1381 (7th Cir. 1995).

Federal courts in Georgia have held that these conditions justify permissive intervention in similar election disputes. *E.g.*, *New Ga. Project v. Raffensperger*, 2021 WL 2450647, at *2 (N.D. Ga. June 4, 2021) (granting intervention to the same Movants

here); *Greene v. Raffensperger*, 2022 WL 1045967, at *5 (N.D. Ga. Apr. 7, 2022). That's often the simplest path, since "the Court need not determine whether [Movants] are entitled to intervene as a matter of right under the more stringent standard" when Movants "meet the standard for permissive intervention under Rule 24(b)." *Ga. Aquarium*, 309 F.R.D. at 690. This Court should thus grant permissive intervention.

CONCLUSION

For these reasons, the Court should grant the RNC and GAGOP's motion to intervene as a matter of right under O.C.G.A. §9-11-24(a) or, alternatively, for permissive intervention under O.C.G.A. §9-11-24(b).

Respectfully submitted this 30th day of August, 2024.

/s/ *William Bradley Carver, Sr.*

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CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of September, 2024, a true and correct copy of the foregoing **MOTION TO INTERVENE** was electronically filed with the Court using the Court's eFileGA electronic filing system, which will automatically send an email notification of such filing to all attorneys of record, and was additionally served by emailing a copy to the currently known counsel of named parties and proposed intervenors as listed below:

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