

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

AMERICA FIRST POLICY INSTITUTE et
al.,

Plaintiffs,

vs.

JOSEPH R. BIDEN, JR., in his official
capacity as President of the United States, et
al.,

Defendants.

No. 2:24-cv-152-Z

**MOTION TO INTERVENE BY PROPOSED INTERVENOR-DEFENDANTS LEAGUE
OF WOMEN VOTERS, BLACK VOTERS MATTER, AND NAEVA**

Pursuant to Rule 24(a) of the Federal Rules of Civil Procedure, the League of Women Voters, Black Voters Matter and Naeva (collectively, the “Proposed Intervenor-Defendants”) respectfully move to intervene as a matter of right as party-defendants in the above-captioned matter. In the alternative, the Proposed Intervenor-Defendants respectfully move for permissive intervention under Federal Rule of Civil Procedure 24(b). This motion is supported by the attached memorandum of law. Proposed Intervenor-Defendants also attach their proposed motion to dismiss and accompanying memoranda to be filed in the event that intervention is granted.

Dated: September 14, 2024

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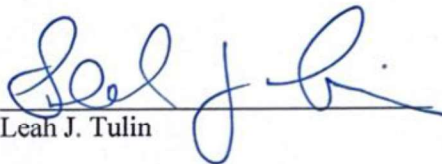
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**Application for Admission Pro Hac Vice Forthcoming*

CERTIFICATE OF CONFERENCE

I certify that on September 13, 2024, pursuant to Local Rule 7.1 (a), Counsel for Proposed-Intervenor Defendants reached out to Counsel for the Plaintiffs and the Federal Defendants in this matter regarding this Motion. Counsel sent an email to all counsel of record asking their positions on Intervention. Counsel for both Plaintiffs and Defendants responded that they have no position at this time and would take a position once they review the papers. Accordingly, it is not known at this time if this motion will be opposed.


Leah J. Tulin

CERTIFICATE OF SERVICE

I certify that on September 14, 2024, the foregoing document was filed on the Court's CM/ECF system, which sent notification of such filing to all counsel of record.

/s/ Edgar Saldivar
Edgar Saldivar