

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

DEMOCRATIC NATIONAL COMMITTEE, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, *et al.*,

Defendants.

Civil Action No. 25-0952 (CKK)

**[PROPOSED] ANSWER
BY THE REPUBLICAN NATIONAL COMMITTEE
TO THE DEMOCRATIC PARTY PLAINTIFFS' COMPLAINT**

Thomas R. McCarthy (D.C. Bar 489651)
Gilbert C. Dickey (D.C. Bar 1645164)
Conor D. Woodfin (D.C. Bar 1780807)
William Bock IV* (Ohio Bar o105262)
CONSOVOY MCCARTHY PLLC
1600 Wilson Blvd., Ste. 700
Arlington, VA 22209
(703) 243-9423
tom@consovoymccarthy.com
gilbert@consovoymccarthy.com
conor@consovoymccarthy.com
wbock@consovoymccarthy.com

Lee E. Goodman (D.C. Bar 435493)
Michael Columbo (D.C. Bar 476738)
DHILLON LAW GROUP
lgoodman@dhillonlaw.com
mcolumbo@dhillonlaw.com
2121 Eisenhower Ave., Suite 608
Alexandria, VA 22314
(415) 433-1700

**pro hac vice forthcoming*

*Counsel for Proposed Intervenor-Defendant
The Republican National Committee*

Proposed Intervenor—the Republican National Committee—answers Plaintiffs’ complaint. Unless expressly admitted below, every allegation in the complaint is denied. Accordingly, the Republican National Committee states:

INTRODUCTION

1. The allegations in this paragraph are legal conclusions to which no response is required.

2. The cited source speaks for itself. The allegations in this paragraph are otherwise legal conclusions to which no response is required.

3. The cited sources speak for themselves. The allegations in this paragraph are otherwise legal conclusions to which no response is required.

4. The cited Executive Order speaks for itself. Intervenor otherwise denies the allegations in the rest of the paragraph.

5. The cited authority speaks for itself. Intervenor otherwise denies the allegations in the rest of the paragraph.

6. Deny.

7. The cited authority speaks for itself. Intervenor otherwise denies the allegations in the rest of the paragraph.

8. The cited authority speaks for itself. Intervenor otherwise denies the allegations in the rest of the paragraph.

9. Deny.

JURISDICTION AND VENUE

10. Intervenor admits that Plaintiffs have filed their action under the cited provisions of federal law but denies that Plaintiffs have any valid claim under these laws.

11. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

PARTIES

12. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

13. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

14. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

15. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

16. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

17. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

18. Intervenor admits that Donald J. Trump is President of the United States. The allegations in this paragraph are otherwise legal conclusions to which no response is required.

19. The cited statute speaks for itself. Intervenor admits that Plaintiffs have sued the named Defendants in their official capacities.

20. Admit.

21. The cited statute speaks for itself. The allegations in this paragraph are otherwise legal conclusions to which no response is required. Intervenor admits that Plaintiffs have sued the named Defendant in her official capacity.

22. Admit.

23. Admit.

24. The cited statute speaks for itself. Intervenor admits that Plaintiffs have sued the named Defendant in his official capacity.

25. The cited statute speaks for itself. Intervenor admits that Plaintiffs have sued the named Defendant in his official capacity.

26. The cited statute speaks for itself. Intervenor admits that Plaintiffs have sued the named Defendant in her official capacity.

27. The cited statute speaks for itself. Intervenor admits that Plaintiffs have sued the named Defendant in his official capacity.

28. Intervenor admits that Plaintiffs have sued the named Defendant in his official capacity.

STATEMENT OF LAW AND FACTS

29. The cited authority speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

30. The cited authority speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

31. The cited authority speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

32. The cited authority speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

33. The cited authority speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

34. The cited constitutional provision speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

35. The cited authority speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

36. The cited authority speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

37. The cited authority speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

38. The cited authority speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

39. Intervenor admits the allegations in the first sentence of this paragraph but otherwise denies the allegations made in the rest of this paragraph.

40. The cited statutes and authority speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

41. The cited authorities speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

42. The cited authorities speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

43. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

44. Intervenor denies the allegations in the first sentence of this paragraph and otherwise lacks sufficient information to admit or deny the allegations in the rest of this paragraph.

45. The cited statutes speak for themselves. Intervenor denies that “[p]ost-election-day ballot receipt deadlines are not new.”

46. The cited congressional testimony speaks for itself. Intervenor otherwise denies the allegations in the rest of the paragraph.

47. The cited authority and legislation speak for themselves. Intervenor otherwise denies the allegations made in this paragraph.

48. The cited briefs speak for themselves. Intervenor otherwise denies the allegations made in this paragraph.

49. The cited statutes speak for themselves. Intervenor otherwise denies the allegations made in this paragraph.

50. The cited authorities speak for themselves. Intervenor otherwise denies the allegations made in this paragraph.

51. The cited authorities speak for themselves. Intervenor otherwise denies the allegations made in this paragraph.

52. The cited authorities speak for themselves. Intervenor otherwise denies the allegations made in this paragraph.

53. Deny.

54. Admit.

55. The cited statutes speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

56. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

57. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

58. The cited statute and congressional testimony speak for themselves. Intervenor otherwise lacks sufficient information to admit or deny the allegations made in this paragraph.

59. The cited statutes speak for themselves. Intervenor otherwise lacks sufficient information to admit or deny the allegations made in this paragraph.

60. The cited statute speaks for itself. Intervenor otherwise denies the allegations made in this paragraph.

61. The cited authorities speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

62. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

63. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

64. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

65. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

66. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

67. The cited statute and authorities speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

68. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

69. The cited statutes speak for themselves. Intervenor otherwise lacks sufficient information to admit or deny the allegations made in this paragraph.

70. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

71. Intervenor admits the allegations in the first sentence of this paragraph but denies the allegations in the rest of the paragraph.

72. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

73. Intervenor denies the allegations in the first two sentences of this paragraph but otherwise lack sufficient information to admit or deny the allegations made in the rest of this paragraph.

74. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required

75. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

76. The cited statutes speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

77. The cited opinions speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

78. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

79. The cited Executive Order speaks for itself. Intervenor otherwise lacks sufficient information to admit or deny the allegations made in this paragraph.

80. The cited Executive Order speaks for itself. Intervenor otherwise lacks sufficient information to admit or deny the allegations made in this paragraph.

81. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

82. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

83. The cited statutes speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

84. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

85. This paragraph consists of legal conclusions to which no response is required.

86. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

87. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

88. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

89. This paragraph consists of legal conclusions to which no response is required.

90. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

91. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

92. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

93. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

94. The cited statute speaks for itself. Intervenor otherwise denies the allegations made in this paragraph.

95. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

96. The cited statute and authority speak for themselves. The remaining allegations in this paragraph are denied.

97. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

98. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

99. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

100. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

101. Deny.

102. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

103. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

104. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

105. The cited statutes speak for themselves. The remaining allegations in this paragraph are denied.

106. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

107. Intervenor admits that post-election receipt of absentee ballots tends to favor Democratic candidates. Intervenor otherwise lacks sufficient information to admit or deny the allegations made in this paragraph.

108. The cited authorities speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

109. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

110. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

111. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

112. The cited authority speaks for itself. The remaining allegations in this paragraph are denied.

113. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are denied.

114. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

115. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are denied.

116. The cited authorities speak for themselves. The remaining allegations in this paragraph are denied.

117. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

118. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

119. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

120. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

121. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

122. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

123. The cited authorities speak for themselves. The remaining allegations in this paragraph are denied.

124. The cited authority speaks for itself. The remaining allegations in this paragraph are denied.

125. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

**CLAIMS FOR RELIEF
COUNT I**

126. Intervenor incorporates its prior responses.

127. The cited authorities speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

128. The cited authority and Federalist Papers speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

129. The cited authorities speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

130. The cited authority and law review article speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

131. Deny.

132. Deny.

133. The cited authorities speak for themselves. Intervenor denies that Plaintiffs are entitled to the requested relief.

COUNT II

134. Intervenor incorporates its prior responses.

135. The cited authorities speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

136. The cited authorities and statutes speak for themselves. The remaining allegations in this paragraph are denied.

137. Deny.

138. The cited authorities and statutes speak for themselves. The remaining allegations in this paragraph are denied.

139. The cited authority speaks for itself. The remaining allegations in this paragraph are denied.

140. The cited authorities for themselves. The remaining allegations in this paragraph are denied.

141. The cited authorities and Executive Order speak for themselves. Intervenor denies that Plaintiffs are entitled to the requested relief.

COUNT III

142. The cited authorities and constitutional provisions speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

143. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are denied.

144. The cited authorities speak for themselves. The remaining allegations in this paragraph are denied.

145. Deny.

COUNT IV

146. Intervenor incorporates its prior responses.

147. The cited constitutional provisions speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

148. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

149. The cited statutes speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

150. The cited authorities speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

151. Deny.

152. Deny.

153. Deny.

154. Deny.

155. The cited authority speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

156. Deny.

157. Deny.

158. The cited authority speaks for itself. The remaining allegations in this paragraph are denied.

159. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are denied.

160. Deny.

161. The cited authority and Executive Order speak for themselves. The remaining allegations in this paragraph are denied.

162. The cited authority speaks for itself. The remaining allegations in this paragraph are denied.

163. Deny.

COUNT V

164. Intervenor incorporates its prior responses.

165. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

166. The cited authorities speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

167. The cited Executive Order and authorities speak for themselves. The remaining allegations in this paragraph are denied.

168. The cited authorities and statute speak for themselves. The remaining allegations in this paragraph are denied.

169. The cited Executive Order and statute speak for themselves. The remaining allegations in this paragraph are denied.

170. Deny.

COUNT VI

171. Intervenor incorporates its prior responses.

172. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

173. The allegations in this paragraph are legal conclusions to which no response is required.

174. The cited Executive Order and statutes speak for themselves. The remaining allegations in this paragraph are denied.

175. The cited authorities and statutes speak for themselves. The remaining allegations in this paragraph are denied.

176. The cited statutes speak for themselves. Intervenor otherwise lacks sufficient information to admit or deny the allegations in this paragraph.

177. The cited statutes speak for themselves. The remaining allegations in this paragraph are denied.

178. Deny.

COUNT VII

179. Intervenor incorporates its prior responses.

180. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

181. The allegations in this paragraph are legal conclusions to which no response is required.

182. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are denied.

183. The cited statutes speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

184. Deny.

185. Deny.

COUNT VIII

186. Intervenor incorporates its prior responses.

187. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

188. The cited authorities speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

189. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

190. The cited statutes and Executive Order speak for themselves. The remaining allegations in this paragraph are denied.

191. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are denied.

192. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

193. The cited authorities and Executive Order speak for themselves. The remaining allegations in this paragraph are denied.

194. Deny.

COUNT IX

195. Intervenor incorporates its prior responses.

196. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

197. The allegations in this paragraph are legal conclusions to which no response is required.

198. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

199. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

200. The cited authorities speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

201. The cited authority speaks for itself. Intervenor denies that Plaintiffs are entitled to the requested relief.

202. Deny.

203. The cited statute speaks for itself. The remaining allegations in this paragraph are denied.

204. The cited authorities speak for themselves. The remaining allegations in this paragraph are denied.

COUNT X

205. Intervenor incorporates its prior responses.

206. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

207. The cited authorities speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

208. Deny.

209. The cited authorities speak for themselves. The allegations in the first and last sentences of this paragraph are denied. Intervenor otherwise lacks sufficient information to admit or deny the allegations in this paragraph.

210. The cited statute speak for itself. The remaining allegations in this paragraph are denied.

211. Deny.

212. Deny.

COUNT XI

213. Intervenor incorporates its prior responses.

214. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

215. The allegations in this paragraph are legal conclusions to which no response is required.

216. The cited statute speaks for itself. The remaining allegations in this paragraph are denied.

217. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

218. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are denied.

219. Deny.

PRAYER FOR RELIEF

- A. Intervenor denies that Plaintiffs are entitled to the requested relief.
- B. Intervenor denies that Plaintiffs are entitled to the requested relief.
- C. Intervenor denies that Plaintiffs are entitled to the requested relief.
- D. Intervenor denies that Plaintiffs are entitled to the requested relief.
- E. Intervenor denies that Plaintiffs are entitled to the requested relief.
- F. Intervenor denies that Plaintiffs are entitled to the requested relief.
- G. Intervenor denies that Plaintiffs are entitled to the requested relief.
- H. Intervenor denies that Plaintiffs are entitled to the requested relief.
- I. Intervenor denies that Plaintiffs are entitled to the requested relief.
- J. Intervenor denies that Plaintiffs are entitled to the requested relief.
- K. Intervenor denies that Plaintiffs are entitled to the requested relief.
- L. Intervenor denies that Plaintiffs are entitled to the requested relief.
- M. Intervenor denies that Plaintiffs are entitled to the requested relief.
- N. Intervenor denies that Plaintiffs are entitled to the requested relief.

AFFIRMATIVE DEFENSES

- 1. The complaint fails to state a claim upon which relief may be granted.
- 2. Plaintiffs' requested relief is foreclosed by the *Purcell* principle.

Respectfully submitted this 3rd day of June, 2025.

/s/ Thomas R. McCarthy

Lee E. Goodman (D.C. Bar 435493)
Michael Columbo (D.C. Bar 476738)
DHILLON LAW GROUP
2121 Eisenhower Ave., Ste. 608
Alexandria, VA 22314
(415) 433-1700
lgoodman@dhillonlaw.com
mcolumbo@dhillonlaw.com

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tom@consovoymccarthy.com
gilbert@consovoymccarthy.com
conor@consovoymccarthy.com
wbock@consovoymccarthy.com

*Counsel for proposed Intervenor-Defendant
The Republican National Committee*