

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

RED WINE & BLUE, and OHIO
ALLIANCE FOR RETIRED AMERICANS,

Plaintiffs,

v.

FRANK LAROSE, in his official capacity as
Ohio Secretary of State, CHARLES L.
NORMAN, in his official capacity as Ohio's
Registrar of Motor Vehicles,

Defendants.

Case No.: 1:25-cv-01760

Judge Solomon Oliver, Jr.

Mag. Judge James E. Grimes, Jr.

**PLAINTIFFS' OPPOSITION TO REPUBLICAN NATIONAL COMMITTEE'S MOTION
TO INTERVENE**

INTRODUCTION

Plaintiffs Red Wine & Blue and the Ohio Alliance for Retired Americans brought this challenge to the proof-of-citizenship requirement in HB 54, which (1) imposes an unnecessary obstacle to register to vote at offices of Ohio’s Bureau of Motor Vehicles (“BMV”) in violation of the National Voter Registration Act (“NVRA”) and (2) is impermissibly vague in violation of the U.S. Constitution. Through this lawsuit, Plaintiffs seek to enjoin a state law that makes it harder for their members to register to vote and thereby protect the voting rights of their members and other Ohioans under federal law.

The Republican National Committee (“RNC”) seeks to intervene as a defendant, but its motion is deficient at virtually every turn. The RNC does not meet the requirements to intervene as a matter of right under Federal Rule of Civil Procedure 24(a) because it fails to identify any specific, legally protectible interest that may be impaired in this litigation. Instead, it relies on speculative concerns that amount to nothing more than a generalized interest in election integrity and voter confidence, insufficient to support intervention. The RNC also fails to overcome the presumption that the existing State Defendants adequately represent its interests in defending HB 54. Finally, the RNC also fails to demonstrate that permissive intervention under Rule 24(b) would be appropriate here. The RNC’s intervention would only add unnecessary delay and complications in a case that should be resolved promptly, and well in advance of next year’s election.

The Court should deny the RNC’s motion. But if it grants the motion, the Court should follow the lead of other courts when they have allowed political parties to intervene in similar cases and impose conditions to avoid unnecessarily complicating this case and to avoid duplicative work, including by requiring the RNC to move for leave to file separate briefing, conduct separate

discovery, or present separate testimony from the existing Defendants, for issues where the RNC believes that its interests diverge and are not adequately represented by Defendants.

ARGUMENT

I. **The RNC does not have an unconditional right of intervention in cases challenging election laws.**

Perhaps recognizing that it cannot satisfy the well-established standards to entitle it to intervene as of right, the RNC argues that the Court should apply a different, preferential standard. Specifically, the RNC argues that, as a political party, it has an “unconditional” right to intervene in challenges to state election laws. *See* Mem. in Supp. of Mot. to Intervene (“Mem.”) at PageID 161 (Sep. 24, 2025), Doc. 17-1; *see id.* at PageID 159–60, 163, 165. This is flatly wrong. Political parties, like everyone else, must meet the intervention standards set out in Federal Rule of Civil Procedure 24. And where, as here, a case is brought by nonpartisan plaintiffs seeking to facilitate the right to vote for all voters, courts have regularly denied intervention to political party entities like the RNC, except where they demonstrate that (1) the resolution of the case could make it harder for their supporters to vote or have their ballots counted, or (2) the existing parties may not adequately represent their interests (particularly where the existing parties include the opposition political party).¹

The cases the RNC cites do not hold otherwise. The RNC relies heavily on *DNC v. Hobbs*, *see* Mem. at PageID 159–60, but the RNC fails to acknowledge that it was *denied* intervention in the original case, which was brought by nonpartisan plaintiffs. In that order denying intervention, the court found that the State Defendants adequately represented the RNC’s interests in defending

¹ *See, e.g.*, Order at 9, 12, *League of United Latin Am. Citizens v. Exec. Office of the Pres.* (“*LULAC*”), No. 1:25-cv-946 (D.D.C. June 12, 2025), Doc. 135 (granting RNC intervention where DNC was already a plaintiff in consolidated case); *Issa v. Newsom*, No. 20-cv-1044-MCE-CKD, 2020 WL 3074351, at *3–4 (E.D. Cal. June 10, 2020) (granting Democratic Party committees intervention to “assert[] the rights of their members to vote safely” by mail during pandemic).

the challenged proof-of-citizenship requirement. Order at 3–6, *Mi Familia Vota v. Hobbs*, No. 2:22-cv-00509 (D. Ariz. June 23, 2022), Doc. 57. The RNC was later allowed to intervene in a parallel challenge filed by the DNC, where the DNC did not oppose its intervention. Order, *DNC v. Hobbs*, No. 2:22-cv-01369 (D. Ariz. Aug. 24, 2022), Doc. 18.² The second case on which the RNC heavily relies, *LULAC v. Executive Office of the President*, had also been consolidated with a case brought by the DNC when the court granted the RNC’s motion to intervene. Order at 1–2, *LULAC*, *supra* n.1.

Of all the cases the RNC cites, only two involved an explicit grant of intervention as of right—in one case, the law at issue *directly regulated* the political committees that sought to intervene, *La Union del Pueblo Entero v. Abbott* (“*LUPE*”), 29 F.4th 299, 306 (5th Cir. 2022) (granting political committees intervention as of right where the challenged law “unquestionably regulate[d] the conduct of the Committees’ volunteers and poll watchers”), and the other determined the party’s political rivals, *Libertarian Party of Mich. v. Johnson*, No. 2:12-cv-12782 (E.D. Mich. Sep. 5, 2012), Doc. 23 (granting Michigan Republican Party intervention in a lawsuit adjudicating the eligibility of a rival party’s candidate). The remaining cases involved permissive intervention, all of which were either seemingly unopposed or granted with limited or no reasoning.³ See Mem. at PageID 160 n.1 (listing cases). Further, the RNC inflates its supposed

² That case was later consolidated with cases brought by nonpartisan plaintiffs. Order, *Mi Familia Vota v. Hobbs*, No. 2:22-cv-00509 (D. Ariz. Oct. 27, 2022), Doc. 160.

³ The motion to intervene appears to have been unopposed in the following cases: *King v. Whitmer*, No. 20-13134, 2020 WL 7053810, at *1 (E.D. Mich. Dec. 2, 2020); *Donald J. Trump for President, Inc. v. Benson*, No. 1:20-CV-1083, 2020 WL 8573863, at *1 (W.D. Mich. Nov. 17, 2020); Order, *United States v. Georgia*, No. 1:21-cv-2575 (N.D. Ga. July 12, 2021); Order, *League of Women Voters of Ohio v. LaRose*, No. 1:23-cv-2414 (N.D. Ohio Feb. 6, 2024), Doc. 25; Order, *Vote.org v. Byrd*, No. 4:23-cv-111 (N.D. Fla. May 26, 2023), Doc. 85; Order, *Wood v. Raffensperger*, No. 1:20-cv-5155 (N.D. Ga. Dec. 22, 2020), Doc. 14; Order, *VoteVets Action Fund v. Detzner*, No. 4:18-cv-

support. Two of the cases it cites are identical orders from the same consolidated case granting permissive intervention.⁴ *See id.* Three of the cases are substantively identical orders from the same judge in related (and eventually consolidated) cases, and in each instance the court granted permissive intervention based on concerns about delay in all three cases.⁵ *See id.*

524 (N.D. Fla. Nov. 12, 2018), Doc. 16; Order, *League of Women Voters of Ohio v. LaRose*, No. 2:20-cv-01638 (S.D. Ohio Apr. 2, 2020), Doc. 38; *Ohio Democratic Party v. Blackwell*, No. 2:04-CV-1055, 2005 WL 8162665, at *1 (S.D. Ohio Aug. 26, 2005). The following orders granted permissive intervention with limited or no reasoning: *NRSC v. FEC*, 145 S. Ct. 2843, 2025 WL 1787717, *1 (2025) (no reasoning); Order at 9–12, *Mont. Pub. Int. Rsch. Grp. v. Jacobsen*, No. 6:23-cv-70 (D. Mont. Jan. 18, 2024), Doc. 34 (denying intervention as of right but granting permissive intervention); Order at 3, 7, *Int’l All. of Theater Stage Emps. Local 927 v. Lindsey*, No. 1:23-cv-4929 (N.D. Ga. May 3, 2024), Doc. 84 (considering only whether there was a common question of fact or law and whether it would cause undue delay or prejudice for permissive intervention); *Ne. Ohio Coal. for the Homeless v. LaRose*, No. 1:23 CV 00026, 2023 WL 2991932, at *1 (N.D. Ohio Apr. 18, 2023) (same); *A. Philip Randolph Inst., of Ohio v. LaRose*, No. 1:20-CV-01908, 2020 WL 5524842, at *1–2 (N.D. Ohio Sept. 15, 2020) (same); *Priorities USA v. Nessel*, No. 19-13341, 2020 WL 2615504, at *2 (E.D. Mich. May 22, 2020) (same); *Ohio A. Philip Randolph Inst. v. Smith*, No. 1:18CV357, 2018 WL 8805953, at *5 (S.D. Ohio Aug. 16, 2018) (same); Order at 5–7, *New Ga. Project v. Raffensperger*, No. 1:21-cv-1333 (N.D. Ga. June 4, 2021), Doc. 39 (same); Order at 5–7, *Ga. State Conf. of NAACP v. Raffensperger*, No. 1:21-cv-1259 (N.D. Ga. June 4, 2021), Doc. 40 (same); Order at 5–6, *Black Voters Matter Fund v. Raffensperger*, No. 1:20-cv-4869 (N.D. Ga. Dec. 9, 2020), Doc. 42 (same); Min. Entry, *Brown v. Detzner*, No. 3:12-cv-852 (M.D. Fla. Sep. 19, 2012), Doc. 38 (no reasoning); *see also* Order at 2–4, *Harriet Tubman Freedom Fighters Corp. v. Lee*, No. 4:21-cv-242 (N.D. Fla. July 6, 2021), Doc. 34 (granting permissive intervention to avoid the delay associated with an appeal); Order at 2–4, *Fla. State Conf. of Branches & Youth Units of the NAACP v. Lee*, No. 4:21-cv-187 (N.D. Fla. June 8, 2021), Doc. 43 (same); Order at 2–3, *League of Women Voters of Fla. v. Lee*, No. 4:21-cv-186 (N.D. Fla. June 4, 2021), Doc. 72 (same).

⁴ Order, *New Ga. Project v. Raffensperger*, No. 1:21-cv-1333 (N.D. Ga. June 4, 2021), Doc. 39; Order, *Ga. State Conf. of NAACP v. Raffensperger*, No. 1:21-cv-1259 (N.D. Ga. June 4, 2021), Doc. 40.

⁵ Order, *Harriet Tubman Freedom Fighters Corp. v. Lee*, No. 4:21-cv-242 (N.D. Fla. July 6, 2021), Doc. 34; Order, *Fla. State Conf. of Branches & Youth Units of the NAACP v. Lee*, No. 4:21-cv-187 (N.D. Fla. June 8, 2021), Doc. 43; Order, *League of Women Voters of Fla. v. Lee*, No. 4:21-cv-186 (N.D. Fla. June 4, 2021), Doc. 72. *See* Order, *League of Women Voters of Fla. v. Lee*, No. 4:21-cv-186 (N.D. Fla. Dec. 8, 2021), Doc. 365 (consolidating cases for trial).

Where the RNC has attempted to intervene in cases brought by nonpartisan plaintiffs seeking to make it easier for all voters to vote—including in similar challenges to proof-of-citizenship requirements—its intervention is regularly denied. *See, e.g.,* Order, *N.H. Youth Movement v. Scanlan*, No. 24-cv-291-SE (D.N.H. Mar. 13, 2025), Doc. 48 (explaining that the court had “indicated its intent to deny” RNC and state Republican committee’s intervention motion in challenge to New Hampshire’s proof-of-citizenship requirement brought by nonpartisan plaintiffs); Order, *Mi Familia Vota v. Hobbs*, No. CV-22-00509 (D. Ariz. June 23, 2022), Doc. 57 (denying intervention by RNC and other Republican committees because they “share the same objective” with State Defendants of defending Arizona’s proof-of-citizenship requirements); *see also* *Democracy N.C. v. N.C. State Bd. of Elections*, No. 1:20CV457, 2020 WL 6589359, at *1 (M.D.N.C. June 30, 2020); *Yazzie v. Hobbs*, No. CV-20-08222-PCT-GMS, 2020 WL 8181703, at *4 (D. Ariz. Sep. 16, 2020); *Common Cause R.I. v. Gorbea*, No. 1:20-CV-00318-MSM-LDA, 2020 WL 4365608, at *3 n.5 (D.R.I. July 30, 2020); *cf. Am. Ass’n of People With Disabilities v. Herrera*, 257 F.R.D. 236, 258 (D.N.M. 2008) (denying state Republican Party intervention as defendant in challenge to voter registration law); *Nemes v. Bensinger*, 336 F.R.D. 132, 137 (W.D. Ky. 2020) (denying intervention to Democratic committee seeking to intervene as plaintiff in challenge to polling place restrictions during COVID-19 pandemic).

In short, the RNC overreaches by suggesting that political parties have an “unconditional” right to intervene in challenges to election laws. Mem. at PageID 161. Like all proposed intervenors, the RNC must satisfy each of Rule 24(a)’s requirements to be entitled to intervention as of right. For the reasons that follow, it does not.

II. The RNC is not entitled to intervene as of right.

To intervene as of right under Rule 24(a)(2), a proposed intervenor must establish that: “(1) the motion to intervene is timely; (2) the proposed intervenor has a substantial legal interest in the

subject matter of the case; (3) the proposed intervenor’s ability to protect that interest may be impaired in the absence of intervention; and (4) the parties already before the court may not adequately represent the proposed intervenor’s interest.” *United States v. Michigan*, 424 F.3d 438, 443 (6th Cir. 2005) (citing *Grutter v. Bollinger*, 188 F.3d 394, 397–98 (6th Cir. 1999)). The proposed intervenor “must prove each of the four factors; failure to meet one of the criteria will require that the motion to intervene be denied.” *Grubbs v. Norris*, 870 F.2d 343, 345 (6th Cir. 1989). Here, the RNC fails to satisfy at least three of these criteria.

A. The RNC has no legally protectable interests in this lawsuit, and its ability to protect its interests will not be impaired without intervention.

The RNC does not have a cognizable interest that justifies intervention, nor has it demonstrated that Plaintiffs’ success in this lawsuit would impede any such cognizable interest. Fed. R. Civ. P. 24(a)(2). The Sixth Circuit requires intervenors to have a “direct, substantial interest” in the litigation which must be “significantly protectable.” *Purnell v. City of Akron*, 925 F.2d 941, 947 (6th Cir. 1991) (quoting *Jansen v. City of Cincinnati*, 904 F.2d 336, 341 (6th Cir. 1990)). The RNC falls short of these requirements.

First, the “interests” that the RNC asserts are primarily abstract concerns about election integrity and voter confidence, but courts have repeatedly found such interests too speculative and generalized to support intervention.⁶ *See also Coal. to Defend Affirmative Action v. Granholm*, 501

⁶ *See, e.g., Liebert v. Wis. Elections Comm’n*, 345 F.R.D. 169, 173 (W.D. Wis. 2023) (holding “the integrity of the election process” is “not a ‘direct, significant and legally protectable interest’”) (citation omitted); *Common Cause Ind. v. Lawson*, No. 1:17-cv-03936-TWP-MPB, 2018 WL 1070472, at *4–5 (S.D. Ind. Feb. 27, 2018) (finding organization’s claimed interests in “state control over structuring its own election system” and the state’s “ability to conduct fair and robust elections” “too generalized to afford a right to intervention under Rule 24(a)”; *Am. Ass’n of People with Disabilities*, 257 F.R.D. at 253 (“[A]n interest in fair elections and the prevention of voter registration fraud . . . [is] too general an interest to form the basis of a rule 24(a) [sic] motion.”); *Miracle v. Hobbs*, 333 F.R.D. 151, 155 (D. Ariz. 2019) (rejecting Republican legislators’ “highly generalized argument that [they] ha[d] an interest in upholding the constitutionality of the [election

F.3d 775, 782 (6th Cir. 2007) (finding that “a general ideological interest in the lawsuit—like seeing that the government zealously enforces some piece of legislation that the organization supports—and the lawsuit does not involve the regulation of the organization’s conduct” insufficient to support intervention). While the RNC claims that its “interests are not too generalized” because “[n]ot all Ohioans have an interest in electing Republicans or conserving the resources of the Republican Party,” Mem. at PageID 165, enjoining the proof-of-citizenship requirement in HB 54 will not have any particularized impact on Republican voters or the Republican Party. To the contrary, an injunction of HB 54 will ensure that *all* voters can register and update their registration at the BMV (as they could before the enactment of HB 54), whether or not they have provided proof-of-citizenship documents. This includes voters who will go on to vote for Republican candidates.

Thus, when the RNC claims that intervention is justified to protect its “interest in Republican voters voting,” *id.* at PageID 164, it cannot mean that this case threatens the ability of Republican voters to exercise their right to vote, as enjoining HB 54 will make it *easier* for *all* prospective voters (including Republicans) to vote. If the RNC instead means to insinuate that, if HB 54 is enjoined, it will benefit the RNC because it will make it *harder* for non-Republican voters to vote, no court has ever found that there is a cognizable interest in keeping other voters from voting. *See, e.g., Harris v. Pemsley*, 820 F.2d 592, 601 (3rd Cir.), *cert. denied*, 484 U.S. 947 (1987) (concluding interest in perpetuating “unconstitutional conditions” not a “legally protected interest” that can support intervention); *Ariz. Democratic Party v. Hobbs*, 18 F.4th 1179, 1195–96 (9th Cir. 2021) (“The 2019 law made it *easier* for a different category of voters to effect their vote, but we

regulation]”); *cf. Donald J. Trump for President, Inc. v. Boockvar*, 493 F. Supp. 3d 331, 376 (W.D. Pa. 2020) (holding plaintiffs, including the RNC, lacked standing to vindicate generalized election integrity interests).

fail to see how that law raises constitutional concerns here.” (citing *Short v. Brown*, 893 F.3d 671, 678 (9th Cir. 2018)); cf. *Mecinas v. Hobbs*, 30 F.4th 890, 898 (9th Cir. 2022) (explaining a political party or candidate asserting competitive standing must show an injury that creates “an unfair advantage”).

Instead, the RNC appears to contend that this litigation threatens Republican voters because they might stay home if HB 54 is enjoined due to resulting diminished voter confidence. Mem. at PageID 164–65. But the RNC does not offer any evidence to support this rank speculation. See *Tarpon Towers II, LLC v. City of Sylvania*, 586 F. Supp. 3d 755, 757 (N.D. Ohio 2022) (rejecting Rule 24(a) motion in part because interests identified by proposed intervenor were “subjective, speculative, and unsubstantiated”); see also *United States v. Michigan*, 424 F.3d at 444 (denying intervention because proposed intervenors’ theory of inadequate representation was speculative). And to the contrary, courts have found that laws requiring proof of citizenship may diminish voter confidence by making it harder for citizens to vote without any meaningful or actual anti-fraud benefit. *Fish v. Schwab*, 957 F.3d 1105, 1134–35 (10th Cir. 2020) (finding Kansas’s proof-of-citizenship requirement may erode voter confidence by excluding qualified voters while “only nominally preventing noncitizen voter registration”) (quotations omitted); cf. *League of Women Voters of Ohio v. LaRose*, 741 F. Supp. 3d 694, 721 (N.D. Ohio 2024) (finding no evidence that Republican voters would be dissuaded from voting, that Republican voters’ confidence in elections would be eroded, or that Republican voter turnout reduced because the voting rights of others are preserved). For the same reasons, the RNC’s claim that it must “divert resources . . . to reinspire Republican voter trust in Ohio’s electoral system, to independently verify the accuracy of Ohio’s voter registration rolls, and to educate voters and candidates concerning Ohio’s changed registration requirements,” Mem. at PageID 165, cannot support intervention. Indeed, if the proof

of citizenship requirement is enjoined, Republican voters will be able to register as easily as they have registered for decades before the enactment of the new challenged requirement; there is no need to “educate” anyone about this change, because it will facilitate registration, not impede it.

That leaves the RNC’s conclusory assertion that this lawsuit implicates its “interest in Republican candidates winning,” which it claims is threatened if the voter rolls “contain ineligible non-citizen registrations.” Mem. at PageID 164. But the RNC has pointed to no evidence that noncitizen voting is actually an issue in Ohio (or elsewhere), and its bald assertion that the voter rolls will be inaccurate if the new proof-of-citizenship requirement is enjoined ignores that, in other states that have imposed proof-of-citizenship requirements, the actual impact has been to suspend, remove, or exclude substantial numbers of *citizen* voters from the voter rolls. *See Fish*, 957 F.3d at 1128; *see also* Compl. ¶¶ 96–102, at PageID 25–26, Doc. 1. In other words, it is the proof-of-citizenship requirement in HB 54 that threatens to disenfranchise voters unaware of the new requirements. And, while the RNC vaguely suggests that it might be less able to efficiently staff or resource campaigns in Ohio based on purportedly less accurate voter registration lists, *see* Mem. at PageID 164–65, it provides no reason to believe that enjoining HB 54 would lead to the RNC changing its political activities in Ohio in any meaningful way. Indeed, the suggestion itself is implausible, particularly given that actual instances of noncitizens voting are vanishingly rare. *See* Compl. ¶¶ 81–86, at PageID 22–23.

B. Defendants adequately represent the RNC’s interests.

Even if the Court found that the RNC asserted a cognizable, protectible interest in this litigation sufficient to satisfy Rule 24, the RNC is not entitled to intervene because the existing State Defendants more than adequately represent the RNC’s interests.

A proposed intervenor is not entitled to intervene as of right when “their interest is adequately represented by existing parties.” *Jansen*, 904 F.2d at 342 (citation omitted). The proposed intervenor bears the burden of demonstrating inadequate representation. *Bradley v. Milliken*, 828 F.2d 1186, 1192 (6th Cir. 1987) (citing *Meyer Goldberg, Inc. v. Goldberg*, 717 F.2d 290, 293 (6th Cir. 1983)). When the proposed intervenor shares the same “ultimate objective” in the litigation with an existing party, courts presume that the existing party adequately represents the proposed intervenor’s interests. *Bradley*, 828 F.2d at 1192. And when the proposed intervenor seeks the same outcome as an existing party, “a slight difference in interests . . . does not necessarily show inadequacy.” *Jansen*, 904 F.2d at 343 (citation omitted). Mere disagreement over litigation strategy does not establish inadequate representation. *Bradley*, 828 F.2d at 1192.

Here, the RNC seeks to defend the proof-of-citizenship requirement imposed by HB 54—the exact same objective as Defendants. The RNC admits that its defenses and those of Defendants “turn on the same legal issue: the legal validity of the challenged law.” Mem. at PageID 169. There is no indication—and the RNC does not even try to allege—that “there is collusion between [Defendants] and an opposing party”; that Defendants “fail[] in the fulfillment of [their] duty”; or that Defendants have “an interest adverse to the proposed intervenor.” *Purnell*, 925 F.2d at 949. Instead, Defendants have mounted a vigorous defense of HB 54, vowed in a public statement to defend this “key election integrity law” and to not “apologize for, or back down from the work [they] do to ensure the integrity of our voter rolls,”⁷ and filed a motion to dismiss and partial motion for judgment on the pleadings, Doc. 15.⁸

⁷ Ohio Sec’y of State, *Secretary LaRose Issues Statement Regarding Activist Lawsuit Attempting to Derail Key Election Integrity Law* (Aug. 25, 2025), <https://www.ohiosos.gov/media-center/press-releases/2025/2025-08-25/>.

⁸ See also NVRA Response Letter (Aug. 21, 2025), Doc. 1-2.

The RNC does not specify how it might defend HB 54 in a way that differs from the Defendants. Instead, it concocts a handful of hypothetical ways in which the Secretary's interests might, at some point in the future, "diverge" from its own, arguing that the Secretary lacks the RNC's specific interests in "promoting Republican candidates' electoral success, supporting Republican voters, and conserving Republican party resources." Mem. at PageID 167. But these "slight difference[s] in interests" in how the RNC might articulate its interests are not sufficient to show inadequacy where, as here, proposed intervenors "seek the same outcome" as Defendants. *Jansen*, 904 F.2d at 343 (quoting *Nuesse v. Camp*, 385 F.2d 694, 702 (D.C. Cir. 1967)). In sum, the RNC has identified no basis to overcome the "presumption of adequacy" applicable here. *Bradley*, 828 F.2d at 1192.

III. The Court should deny permissive intervention.

Courts in this circuit have properly declined to allow permissive intervention where—as here—the proposed intervenor's interests are adequately represented by existing parties and where intervention might cause delay, prejudice, or unnecessary complication. *See, e.g., Bay Mills Indian Cmty. v. Snyder*, 720 F. App'x 754, 759 (6th Cir. 2018) ("The fact that [a proposed intervenor's] position is being represented counsels against granting permissive intervention[.]"); *Grainger v. Ottawa Cnty., Michigan*, 90 F.4th 507, 518 (6th Cir. 2024) (affirming denial of permissive intervention because intervention would cause complications, undue delays, and prejudice the original parties); *Nemes v. Bensinger*, 336 F.R.D. 132, 137 (W.D. Ky. 2020) (finding permissive intervention inappropriate for political committee in case concerning election procedures due to "undue delay and prejudice to the original parties"); *Coal. to Defend Affirmative Action*, 501 F.3d at 784 (affirming denial of permissive intervention where intervenors were adequately represented, lacked a substantial legal interest in the lawsuit, and would inhibit a prompt resolution); *Ohio v. U.S. Env't Prot. Agency*, 313 F.R.D. 65, 71–72 (S.D. Ohio 2016) (finding permissive intervention

inappropriate where proposed intervenors were adequately represented and permitting intervention would “unnecessarily complicate [the] case and delay the proceedings”); *Kentucky v. U.S. Env’t Prot. Agency*, No. 3:23-CV-00007-GFVT, 2023 WL 2415219, at *3 (E.D. Ky. Mar. 8, 2023) (denying permissive intervention “because the Defendants will adequately represent the Proposed Intervenors’ interests and intervention would prejudice the parties and burden judicial economy”). The same is true in courts across the country where intervention is sought in election cases, particularly where intervention might cause delay. *See, e.g., Bost v. Ill. State Bd. of Elections*, 75 F.4th 682, 691 (7th Cir. 2023); *One Wis. Inst., Inc. v. Nichol*, 310 F.R.D. 394, 399 (W.D. Wis. 2015); *Democracy N.C.*, 2020 WL 6589359, at *2.

This Court should do the same here. The RNC’s “legal interests and arguments are closely aligned with those of” Defendants, *Bost*, 75 F.4th at 691, and it has failed to assert or substantiate any separate interests that would render its participation anything other than duplicative. As such, its “addition as a party would add little substance” and serve only to “use up the court’s time and resources” in “an election-law case that needs to be streamlined and decided quickly.” *Id.* To the extent that RNC has any distinct arguments not raised by Defendants or wants to contribute “an important perspective to add the Court’s consideration,” Mem. at PageID 163, it can seek leave to file an amicus brief. *See, e.g., Order at 10–11, RNC v. Wetzel*, 1:24-cv-00025-LG-RPM (S.D. Miss. Mar. 7, 2024), Doc. 47; *Democracy N.C.*, 2020 WL 6589359, at *2. But allowing the RNC to participate as a full party would unduly delay and complicate the adjudication of the rights of the existing parties by introducing unnecessary briefing and discovery into the litigation and forcing the parties (and the Court) to contend with “unnecessary partisan politics in[] an otherwise nonpartisan legal dispute,” *Miracle*, 333 F.R.D. at 156 (cleaned up).

In the alternative, if the Court is nevertheless inclined to allow intervention, it should limit the scope of that intervention to avoid duplicative briefing and minimize delay. Specifically, the Court should require the RNC, if it believes the RNC's interests are not adequately represented by the existing parties on a particular issue, to move for leave to file separate briefing, conduct separate discovery, or present separate testimony. *See* Order at 3–4, *Mi Familia Vota v. Hobbs*, No. 2:21-cv-01423-DWL (D. Ariz. Oct. 4, 2021), Doc. 53 (imposing similar restrictions on intervenor); *A. Philip Randolph Inst., of Ohio v. LaRose*, No. 1:20-CV-01908, 2020 WL 5524842, at *2 (N.D. Ohio Sep. 15, 2020) (limiting intervenors' written submissions and prohibiting intervenors from independent discovery and examining and presenting their own witnesses).

CONCLUSION

For the foregoing reasons, the Court should deny the RNC's motion to intervene.

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CERTIFICATE OF SERVICE

I hereby certify that on October 8, 2025, the foregoing was filed electronically with the Clerk of the Court using the Court's electronic case filing system, which will serve such filing on all counsel of record.

/s/ J. Corey Colombo
J. Corey Colombo