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*, REPUBLICAN NATIONAL COMMITTEE, *Proposed Intervenor-Defendant.*	Case No: 1:25-cv-01760

REPLY IN SUPPORT OF MOTION TO INTERVENE
BY THE REPUBLICAN NATIONAL COMMITTEE

The State consents to the RNC's intervention. Plaintiffs do not. Contrary to Plaintiffs' claims, Opp. 3, the RNC cited multiple cases in which political parties were granted intervention as of right, RNC Mem. (Doc. 17-1) at 2 n.1, 7 (citing *Libertarian Party of Mich. v. Johnson*, No. 2:12-cv-12782 (E.D. Mich. Sep. 5, 2012); *LUPE v. Abbott*, 29 F.4th 299 (5th Cir. 2022); *LULAC v. EOP*, Doc. 135, No. 1:25-cv-946 (D.D.C. June 12, 2025); *Issa v. Newsom*, 2020 WL 3074351 (E.D. Cal. June 10); *Citizens United v. Gessler*, 2014 WL 4549001 (D. Col. Sept. 15)). And Plaintiffs ignore that the RNC was granted intervention as of right earlier this summer in a case concerning the federal proof-of-citizenship requirement. *LULAC*, Doc. 135, at 9. There, the RNC established Article III standing—a higher standard than applies in this Circuit—to intervene as of right. *Id.* at 4-5; *see Davis v. Lifetime Cap.*, 560 F. App'x 477, 488-89 (6th Cir. 2014). Even in a case involving "nonpartisan" groups, the RNC has "standing to intervene" based on its "interest in competing in fair [election] contests." *LULAC*, Doc. 135 at 9. Plaintiffs ignore this mountain of precedent.

Regardless, Plaintiffs provide no good reason to deny the RNC permissive intervention. Permissive intervention is the simplest path forward, which is why most courts don't even reach intervention as of right. *See* RNC Mem. 2 n.1. Under permissive intervention, Plaintiffs' primary argument against the RNC's motion—adequate representation—is "not a required part of the test." *Payne v. Tri-State Careflight, LLC*, 322 F.R.D. 647, 664 (D.N.M. 2017). The RNC's motion should be granted: the weight of authority supports it, the RNC has substantial interests that are not adequately represented, and Plaintiffs provide no legitimate reason why permissive intervention would be inappropriate.

ARGUMENT

I. The great weight of authority supports the RNC's intervention.

The RNC cited a sample of twenty-five decisions, including ten in-circuit decisions, where federal courts allowed political parties to intervene in election law cases. RNC Mem. 2 n.1, 6, 10. Plaintiffs argue that all but two involved permissive intervention. Opp. 4. That's false. In at least half a dozen cases, federal courts, including in this circuit, have granted political parties intervention as of right. *See supra* at 1. In any event, the RNC also moved for permissive intervention here, so the cases are all on point.

Plaintiffs argue that these cases are distinguishable because Plaintiffs are "nonpartisan" groups bringing their case for "nonpartisan" purposes. Opp. 4-6. But they cite no case in which the allegedly "nonpartisan" status of an existing party mattered to a court in its Rule 24(a) analysis. To the contrary, Plaintiffs' claimed "nonpartisan" status *supports* the RNC's intervention because it concedes that the RNC will bring a partisan "perspective" that they "choose not to provide." *Nielsen v. DeSantis*, 2020 WL 6589656, *1 (N.D. Fla. May 28).

That's why the RNC has been granted intervention by right in cases brought by allegedly "nonpartisan" groups. *E.g.*, *LUPE*, 29 F.4th at 309; *LULAC*, Doc. 135 at 6-9. And it's why courts in this circuit have granted permissive intervention to political parties (including the RNC) in cases brought by "non-partisan" groups. *E.g.*, *League of Women Voters of Ohio v. LaRose*, Doc. 25, No. 1:23-

cv-2414 (N.D. Ohio Feb. 6, 2024); *Ne. Ohio Coal. for the Homeless v. LaRose*, 2023 WL 2991932, *1 (N.D. Ohio Apr. 18); *A. Philip Randolph Inst., of Ohio v. LaRose*, 2020 WL 5524842, *1-2 (N.D. Ohio Sept. 15); *League of Women Voters of Ohio v. LaRose*, Doc. 38, No. 2:20-cv-1638 (S.D. Ohio Apr. 2, 2020); *Priorities USA v. Nessel*, 2020 WL 2615504, *1 (E.D. Mich. May 22); *Ohio A. Philip Randolph Inst. v. Smith*, 2018 WL 8805953, *3-5 (S.D. Ohio Aug. 16). "[I]n today's highly charged atmosphere, nearly every dispute over voting procedures is cast in a partisan light, but that makes it incumbent that a court addressing such a dispute take every step possible to insure that its procedures will be perceived by all to be fair and impartial." *A. Philip Randolph Inst.*, 2020 WL 5524842, *2. The Court can best do that by "allow[ing]" the RNC to intervene. *Id.*

Plaintiffs note that in some of those cases no party opposed intervention, and in others the court granted intervention "with limited or no reasoning." Opp. 4 & n.3. But those efficient judgments stand on a body of well-reasoned opinions. *E.g.*, *LUPE*, 29 F.4th at 302-09; *LULAC*, Doc. 135 at 1-13; *Issa*, 2020 WL 3074351, **1-4; *Priorities USA*, 2020 WL 2615504, **1-5; *A. Philip Randolph Inst.*, 2020 WL 5524842, **1-2. Plaintiffs don't discuss—much less refute—the reasoning in those cases. Those short and sweet orders granting intervention are possible because political parties "are routinely found to constitute significant protectable interests" under Rule 24. *Issa*, 2020 WL 3074351, *3. That the RNC intervenes unopposed in many instances only confirms that many plaintiffs don't even bother disputing that the RNC has a legally protectible interest in election law cases.

None of Plaintiffs' cases cast doubt on the RNC's right to intervene. One of those decisions was reversed for purposes of appeal. *Common Cause R.I. v. Gorbea*, 970 F.3d 11, 13-14 (1st Cir. 2020) (reversing denial of intervention in part in *Common Cause R.I. v. Gorbea*, 2020 WL 4365608 (D.R.I. July 30)). A second denied intervention because the motion was untimely, an argument Plaintiffs don't make here. *Yazzie v. Hobbs*, 2020 WL 8181703, *4 (D. Ariz. Sept. 16). A third was "denied as moot" because the RNC "notified the court's case manager" it didn't intend to continue pursuing

intervention. *N.H. Youth Movement v. Scanlan*, Doc. 48 at 1, No. 1:24-cv-291 (D.N.H. Mar. 13, 2025). In a fourth, the court denied the RNC intervention because it had already granted intervention to Republican state legislators, so the RNC's partisan interests were already represented—a distinction not present here. *Democracy N.C. v. N.C. Bd. of Elections*, 2020 WL 6591397, *1-2 (M.D.N.C. June 24). In a fifth, the court later admitted its decision "may be contrary" to the governing "law" concerning intervention by right. *SWEPI, LP v. Mora Cnty.*, 2014 WL 6983288, *35 n.13 (D.N.M. Dec. 5) (citing *Am. Ass'n of People with Disabilities v. Herrera*, 257 F.R.D. 236 (D.N.M. 2008)). In a sixth, the district court dismissed the RNC's intervention motion without prejudice because it granted the RNC intervention in a functionally identical case, and then consolidated the cases on the "same date." *Mi Familia Vota v. Fontes*, Docs. 57, 164, No. 2:22-cv-509 (D. Ariz. June 23, 2022).

Mi Familia Vota exemplifies why the RNC's participation is necessary in lawsuits challenging proof-of-citizenship requirements. There, the RNC appealed judgments and raised arguments that the State of Arizona would not. Last election cycle, the RNC secured emergency relief from the Supreme Court in that case that state defendants opposed. *See RNC v. Mi Familia Vota*, 145 S. Ct. 108 (2024). *Mi Familia Vota* confirms that the RNC brings to election law cases a perspective that other parties will miss or refuse to provide because they do not represent the interests of Republican voters and candidates.

The last case, *Nemes v. Bensinger*, 336 F.R.D. 132 (W.D. Ky. 2020), is the sole in-circuit decision that Plaintiffs cite involving a political committee. There, a Democratic campaign committee sought to intervene as a plaintiff—not a defendant—and inject new claims into a case eleven days before an election. *Id.* at 134-36. Because of the "time-sensitive" nature of the "proceedings," the court denied intervention. *Id.* at 138. The RNC isn't attempting to intervene as a plaintiff. It isn't injecting new claims into the lawsuit. And the next election is over a year away. Opp. 2. *Nemes* doesn't disturb the reasoned conclusions of the numerous courts in this circuit that have granted political parties

intervention in election cases. *E.g.*, *Libertarian Party of Mich.*, No. 2:12-cv-12782, Doc. 23; *League of Women Voters of Ohio*, No. 1:23-cv-2414, Doc. 25, 1; *Ne. Ohio Coal. for the Homeless*, 2023 WL 2991932, *1; *A. Philip Randolph Inst.*, 2020 WL 5524842, *1-2; *League of Women Voters of Ohio*, No. 2:20-cv-1638, Doc. 38, 1; *Priorities USA*, 2020 WL 2615504, *1; *Ohio A. Philip Randolph Inst.*, 2018 WL 8805953, *3-5; *King v. Whitmer*, 2020 WL 7053810, *1 (E.D. Mich. Dec. 2); *Donald J. Trump for President, Inc. v. Benson*, 2020 WL 8573863, *1 (W.D. Mich. Nov. 17); *Ohio Democratic Party v. Blackwell*, 2005 WL 8162665, *2 (S.D. Ohio Aug. 26). The great weight of authority thus supports granting the RNC's motion.

II. The RNC has substantial interests at stake in this case that the State does not adequately represent.

Plaintiffs argue the RNC's interests are too "abstract" and "generalized." Opp. 7. But they don't dispute that the RNC's member-candidates compete in political contests structured by Ohio's election laws. The RNC is no mere bystander when it comes to elections. It competes on the "playing field[]" in election contests against "genuine rival[s]" for political office. *Cf. Shays v. FEC*, 414 F.3d 76, 87 (D.C. Cir. 2005). The RNC thus has a particularized interest in "competing in fair contests." *LULAC*, Doc. 135 at 9. Because enjoining Ohio's proof of citizenship law would "alter the competitive environment" in which Republicans compete, the RNC has a concrete interest. *Shays*, 414 F.3d at 86; *see also Green Party of Tenn. v. Hargett*, 767 F.3d 533, 544 (6th Cir. 2014) (recognizing political competitor standing doctrine). This interest isn't generalized because not every citizen shares the RNC's interests as "'a *political* competitor.'" *Shays*, 414 F.3d at 87.

Plaintiffs argue that the RNC needs "evidence that noncitizen voting is actually an issue in Ohio (or elsewhere)" to make its competitive interests concrete. Opp. 10. But that isn't a requirement at the pleadings stage. "[U]nanimous precedent" supports "acceptance of the proposed intervenor's well-pleaded allegations" in a case where "the propriety of intervention must be determined before discovery." *Sw. Ctr. for Biological Diversity v. Berg*, 268 F.3d 810, 819-20 (9th Cir. 2001) (collecting cases). Moreover, the potential impairment isn't just the possibility that noncitizens will register and vote in

Ohio elections—it's the "need to adjust" one's "campaign strategy" in response to the illegal structuring of a competitive environment. *Shays*, 414 F.3d at 87. Plaintiffs don't dispute that the injunction they demand would alter the "election landscape" for the RNC's "members." *Cf. LUPE*, 29 F.4th at 307. That alteration is enough to give the RNC a legally protectible interest here. *Id.* The competitive harm the RNC will suffer is having to "anticipate and respond" to the potential for inaccuracies in Ohio's voter registration rolls from an injunction of Ohio's proof of citizenship requirement. *Shays*, 414 F.3d at 86. Such an injunction would necessitate the RNC changing its competitive "strategy and conduct." *Vote Choice, Inc. v. DiStefano*, 4 F.3d 26, 37 (1st Cir. 1993). That's because the RNC relies on the accuracy of Ohio's voter-registration lists to "determine its electoral strategy, the number of staff it needs in a given jurisdiction, the number of volunteers needed to contact voters, and how much it will spend contacting voters." RNC Mem. 6-7. If Ohio's voter rolls are inaccurate due to illegal non-citizen registrations, then the RNC is at risk of establishing its campaign strategy on faulty data, which detrimentally affects how the RNC will "run" its "campaigns," raising the potential for impairment of the RNC's legally protectible competitive interests. *Cf. Shays*, 414 F.3d at 87.

Enjoining Ohio's proof of citizenship law will impair numerous other RNC interests. To continue effectively pursuing its core political mission, the RNC must "divert resources" to verify the accuracy of Ohio's voter rolls, "counsel[] interested voters and volunteers" about Ohio's changed requirements, and "monitor[] various aspects of the upcoming election." *Cf. RNC v. N.C. Bd. of Elections*, 120 F.4th 390, 396-97 (4th Cir. 2024). The "voting power" of Republican voters could be diluted by illegal non-citizen votes. *Cf. Hall v. D.C. Bd. of Elections*, 2025 WL 1717330, *4 (D.C. Cir. June 20). And Republican voters' confidence will be discouraged. *Cf. Jud. Watch, Inc. v. Griswold*, 554 F. Supp. 3d 1091, 1104 (D. Colo. 2021). These interests are sufficient for standing, let alone Rule 24(a)'s less "stringent" requirements. *Yniguez v. Arizona*, 939 F.2d 727, 735 (9th Cir. 1991). Plaintiffs contest these interests by arguing that "enjoining HB 54 will make it easier for all prospective voters (including

Republicans)" to register to vote. Opp. 6. But that argument goes to the merits of the RNC's defenses of Ohio's law, not the mettle of the RNC's interests. And "the Court cannot assume" that Plaintiffs will "ultimately prevail on the merits in resolving a motion to intervene." *Pavek v. Simon*, 2020 WL 3960252, at *3 (D. Minn. Jul. 12).

Plaintiffs argue that the RNC lacks "evidence" that non-citizens are registering to vote and that voter confidence will be diminished by those invalid registrations. Opp. 9-10. Both contentions lack merit. The RNC doesn't need "evidence" to support the plausible allegations in its motion to intervene. *See Sw. Ctr. for Biological Diversity*, 268 F.3d at 819-20. Regardless, this Court can take judicial notice of "public records maintained by secretaries of state." *See Morse v. Fifty W. Brewing Co.*, 2022 WL 974342, *2 (S.D. Ohio Mar. 31). This year alone Ohio's Secretary of State has found 140 noncitizen voter registrations on Ohio's voter rolls, including nine individuals who cast potentially fraudulent votes. *Secretary LaRose Announces Additional Evidence of Noncitizen Election Crimes*, Ohio Sec'y of State (Sept. 16, 2025), perma.cc/SYQ2-XRGH [LaRose I]; *Secretary LaRose Continues Audit of Voter Registration Data to Eliminate Noncitizen Registrations*, Ohio Sec'y of State (Mar. 17, 2025), perma.cc/6Q43-AM3B [LaRose II].

That Plaintiffs believe the evidence is meager of "actual instances of noncitizens voting" misunderstands Supreme Court precedent on "real" voter fraud. *Compare* Opp. 10, *with Crawford v. Marion Cnty. Election Bd.*, 553 U.S. 181, 194-96 (2008). Evidence of "occasional examples" that "have surfaced in recent years" is sufficient evidence of election integrity issues to justify state action to verify the identity of voters. *Crawford*, 553 U.S. at 195. Even evidence of voter fraud in another State proves that "the risk of voter fraud" is "real" and can "affect the outcome of a close election." *Id.* at 194-96. By removing a barrier that would prevent non-citizens from registering to vote, Plaintiffs make it easier for non-citizens to gain illegal access to the ballot box and damage the RNC's interests. *Cf. id.*

Plaintiffs dismiss the common-sense notion that proof of citizenship reinforces voter confidence. But both the Supreme Court and the bipartisan Carter–Baker Commission recognize that "'safeguards … to deter or detect fraud or to confirm the identity of voters'" bolster "public confidence in the integrity of the electoral process." *Id.* at 197 (quoting Carter–Baker Report). Plaintiffs call that finding "rank speculation." Opp. 9. The Supreme Court calls it "essential to the functioning of our participatory democracy." *Purcell v. Gonzalez*, 549 U.S. 1, 4 (2006) (per curiam). "While Plaintiffs may disagree with the efficacy" of requiring proof of citizenship, "'the propriety of doing so is perfectly clear.'" *Mi Familia Vota v. Fontes*, 719 F. Supp. 3d 929, 1011 (D. Ariz. 2024) (quoting *Crawford*, 553 U.S. at 196), *aff'd in part, vacated in part*, 129 F.4th 691 (9th Cir. 2025). "Considering the evidence as a whole," proof of citizenship promotes Republican voters' "confidence" in the security of the election and the efficacy of their votes. *Id.*

Plaintiffs argue that the State will adequately represent the RNC's interests because it will vigorously defend the challenged law. But in arguing that the RNC must "specify how it might defend HB 54 in a way that differs from the Defendants," Opp. 12, Plaintiffs confuse divergence of *interests* with divergence of *argument*. As defendants who oppose Plaintiffs' claims, the State and the RNC will likely raise similar arguments. But that the RNC and the State "both believe [Plaintiffs' relief] should be denied … does not mean that [they] have identical positions or interests." *Georgia v. U.S. Army Corps of Eng'rs*, 302 F.3d 1242, 1259-60 (11th Cir. 2002); *accord Wineries of the Old Mission Peninsula Ass'n v. Twp. of Peninsula,* 41 F.4th 767, 776-77 (6th Cir. 2022). Further, at this early stage it is far from clear that the RNC and State Defendants will present the same defenses. The RNC has asserted the affirmative defense of the *Purcell* principle. RNC Proposed Answer, Doc. 17-2 at 11. The State has not. The RNC has asserted the affirmative defense that *all* of the counts of Plaintiffs' complaint fail to state a claim upon which relief must be granted. *Id.* The State has moved to dismiss only some of Plaintiffs' claims, and contested the rest on standing. *See* Defs.' Mot. to Dismiss, Doc. 15. The RNC has thus

"articulated specific relevant defenses that the [State] may not present and, as a consequence, have established the possibility of inadequate representation." *Grutter v. Bollinger*, 188 F.3d 394, 401 (6th Cir. 1999).

Regardless of how vigorously the State plans to defend the challenged law, the RNC and the State's interests still "diverge" here. *Wineries*, 41 F.4th at 777. The State represents "the public interest." *Coal. of Ariz./N.M. Cntys. for Stable Econ. Growth v. DOI*, 100 F.3d 837, 845 (10th Cir. 1996). By contrast, the RNC's interest in this case is "partisan." *LUPE*, 29 F.4th at 309. The RNC doesn't represent the public. It represents Republicans. "Neither the State nor its officials can vindicate such an interest while acting in good faith." *Id.*

The State's non-response confirms that it does not share "identical" interests with the RNC. *Cf. Berger v. N.C. State Conf. of the NAACP*, 597 U.S. 179, 197 (2022). The State "nowhere argue[s]" that it "will adequately protect [the RNC's] interests," which raises "sufficient doubt concerning the adequacy of [its] representation." *U.S. House of Representatives v. Price*, 2017 WL 3271445, *2 (D.C. Cir. Aug. 1). The State's "silence on any intent to defend [the RNC's] special interests is deafening." *Conservation Law Found. of N.E., Inc. v. Mosbacher*, 966 F.2d 39, 44 (1st Cir. 1992). Because the RNC meets the "'minimal'" burden to show that the existing Defendants' representation of their interests, at the very least, "*might* be inadequate," *Grutter*, 188 F.3d at 400, intervention by right is justified.

III. In the alternative, permissive intervention is warranted.

Plaintiffs cite adequate representation by State Defendants in opposition to the RNC's right to intervene—and concerns of undue delay or complication as the only grounds to oppose permissive intervention. Opp. 12-14. But this Court need not address adequate representation to grant the RNC permissive intervention, since permissive intervention "does not require the [proposed intervenor] to demonstrate that its interests are inadequately represented under any standard." *Planned Parenthood of Wis., Inc. v. Kaul*, 942 F.3d 793, 801 n.4 (7th Cir. 2019); *accord Payne*, 322 F.R.D. at 664. That fact makes

granting the RNC permissive intervention "the most prudent and efficient course" to resolving this motion. *Lac Courte Oreilles Band of Lake Superior Chippewa Indians v. United States*, 2002 WL 32350046, *3 (W.D. Wis. Nov. 20). Plaintiffs don't dispute that the RNC meets the requirements for permissive intervention: the RNC has "a claim or defense that shares" a "common question" with this lawsuit. Fed. R. Civ. P. 24(b). And Plaintiffs' fears of delay, complication, or prejudice are unfounded for at least four reasons.

First, Plaintiffs don't contest that the RNC meets the timeliness requirement for intervention as of right under Rule 24(a). That concession hollows out their claims of undue delay under Rule 24(b). Plaintiffs argue that in the future the RNC *might* cause delay by "introducing unnecessary briefing and discovery into the litigation." Opp. 13. But the RNC promised it would "comply[] with whatever briefing schedule the Court imposes." RNC Mem. 11. Plaintiffs ignore that assurance, but it "is a promise" that undermines claims of undue delay. *Emerson Hall Assocs. v. Travelers Cas. Ins. Co. of Am.*, 2016 WL 223794, *2 (W.D. Wis. Jan. 19). The RNC often joins other parties' filings where possible. *See, e.g.*, *VoteAmerica v. Raffensperger*, Doc. 151, 1:21-cv-1390 (N.D. Ga. Dec. 13, 2022) ("Consistent with their pledge to 'work to prevent duplicative briefing,' Intervenor-Defendants join the State's filings [on summary judgment]."). To the extent Plaintiffs assume that the RNC won't comply with court-ordered briefing or discovery deadlines, their speculation contradicts the RNC's explicit promise to this Court and established litigation record.

Second, that the RNC has already filed a proposed answer undermines claims that the RNC will unduly delay these proceedings. Even where a Court has already resolved a motion for preliminary injunction, the RNC's intervention does not cause undue delay. *LULAC*, Doc. 135 at 9, No. 1:25-cv-946. Here, the RNC is filing a proposed answer to Plaintiffs' complaint, which "would place the RNC in the same procedural posture as the [State] Defendants." *Id.* "Under these circumstances, the timing of the RNC's motion will not unfairly disadvantage any party." *Id.*

Third, even if Plaintiffs could establish that the RNC will delay this case, they haven't shown that the RNC will "*unduly* delay" this case. Fed. R. Civ. P. 24(b)(3) (emphasis added). "'Undue' means not normal or appropriate." *Appleton v. Comm'r*, 430 F. App'x 135, 138 (3d Cir. 2011) (quoting Webster's II New Riverside University Dictionary 1259 (1988)). Although "any introduction of an [intervenor] … will inevitably cause some 'delay,'" that kind of ordinary delay is irrelevant. *Id.* Plaintiffs have provided no reason why any potential delay would be "undu[e]." Fed. R. Civ. P. 24(b)(3).

Fourth, the RNC's participation will assist the Court, not burden it. Plaintiffs' concerns about "briefing and discovery" describe the routine practice of litigation. Opp. 13. But Plaintiffs "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). "Whatever additional burdens" adding the RNC as a defendant to this case may pose, "those burdens fall well within the bounds of everyday case management." *Berger*, 597 U.S. at 200. And any "partisan" perspective the RNC provides cuts in favor of granting permissive intervention, not denying it. *See A. Philip Randolph Inst.*, 2020 WL 5524842, *2. Although the RNC maintains it has a right to intervene under Rule 24(a), it does not object to the Court granting permissive intervention without deciding intervention as of right, as this Court has done many times before. *See supra* at 4-5.

* * *

Plaintiffs cite no order delivered by any court in this circuit denying the RNC permissive intervention in an election law case. By contrast, the RNC has produced ten orders in this circuit alone granting the RNC or other political parties intervention in election cases. *See supra* at 4. Following that precedent is straightforward. Deviating from that precedent, however, should raise at least some doubt that denying intervention would be improper. And "[a]ny doubt concerning the propriety of allowing intervention should be resolved in favor of the proposed intervenors." *Fed. Sav. & Loan Ins. v. Falls Chase Special Taxing Dist.*, 983 F.2d 211, 216 (11th Cir. 1993).

CONCLUSION

For these reasons, the Court should grant the RNC's motion.

Dated: October 15, 2025

Respectfully submitted,

/s/ Thomas R. McCarthy

Thomas R. McCarthy*
Gilbert C. Dickey*
Conor D. Woodfin*
William Bock IV*
CONSOVOY MCCARTHY PLLC
1600 Wilson Boulevard, Suite 700
Arlington, VA 22209
(703) 243-9423
tom@consovoymccarthy.com
gilbert@consovoymccarthy.com
conor@consovoymccarthy.com
wbock@consovoymccarthy.com

*Practicing *pro hac vice*

Counsel for Proposed Intervenor-Defendant The Republican National Committee