

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA**

Sean Parnell and Luke Negron,
Plaintiffs,

v.

Allegheny County Board of Elections; Rich
Fitzgerald, in his official capacity as a member
of the Allegheny County Board of Elections;
Samuel DeMarco III, in his official capacity as
a member of the Allegheny County Board of
Elections; and Bethany Hallam, in her official
capacity as a member of the Allegheny County
Board of Elections,

Defendants.

No. 20-cv-1905

PROPOSED INTERVENORS-DEFENDANTS' MOTION TO INTERVENE

Proposed Intervenor-Defendants DCCC and Congressman Conor Lamb move for leave to participate in this action to defend their interests against the claims asserted by Plaintiffs. For the reasons discussed in the memorandum in support, Proposed Interveners are entitled to intervene in this case as a matter of right under Federal Rule of Civil Procedure 24(a)(2). In the alternative, Proposed Interveners request permissive intervention pursuant to Rule 24(b). In accordance with Rule 24(c), a proposed answer to Plaintiffs' complaint is attached as Exhibit A and a proposed opposition to Plaintiffs' motion for injunctive relief is attached as Exhibit B.

WHEREFORE, Proposed Interveners request that the court grant them leave to intervene in the above-captioned matter.

Dated: October 22, 2020.

Respectfully submitted,

/s/ _____

Justin T. Romano
PA ID No. 307879
justin@arlawpitt.com
Marco S. Attisano
PA ID No. 316736
marco@arlawpitt.com
429 Fourth Avenue, Suite 1705
Pittsburgh, PA 15219
Phone: (412) 336-8622
Fax: (412) 336-8629

Marc E. Elias*
Uzoma Nkwonta*
Stephanie Command*
Courtney Elgart*
Jacob D. Shelly*
PERKINS COIE LLP
700 Thirteenth St., N.W., Suite 600
Washington, D.C. 20005-3960
Telephone: (202) 654-6200
Facsimile: (202) 654-9959
melias@perkinscoie.com
unkwonta@perkinscoie.com
scommand@perkinscoie.com
celgart@perkinscoie.com
jshelly@perkinscoie.com

Counsel for Proposed Intervenors

**Motions for Admission Pro Hac Vice
Forthcoming*

CERTIFICATE OF SERVICE

I hereby certify that on Thursday, October 22, 2020, on I filed a copy of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/
Counsel for Proposed Intervenors

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