

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION**

PATSY J. WISE, REGIS CLIFFORD,
CAMILLE ANNETTE BAMBINI, SAMUEL
GRAYSON BAUM, DONALD J. TRUMP
FOR PRESIDENT INC., U.S.
CONGRESSMAN DANIEL BISHOP, U.S.
CONGRESSMAN GREGORY F. MURPHY,
REPUBLICAN NATIONAL COMMITTEE,
NATIONAL REPUBLICAN SENATORIAL
COMMITTEE, NATIONAL REPUBLICAN
CONGRESSIONAL COMMITTEE, and
NORTH CAROLINA REPUBLICAN
PARTY,

Plaintiffs,

v.

THE NORTH CAROLINA STATE BOARD
OF ELECTIONS; DAMON CIRCOSTA, in
his official capacity as CHAIR OF THE
STATE BOARD OF ELECTIONS; STELLA
ANDERSON, in her official capacity as
SECRETARY OF THE STATE BOARD OF
ELECTIONS; JEFF CARMON III, in his
official capacity as MEMBER OF THE
STATE BOARD OF ELECTIONS; KAREN
BRINSON BELL, in her official capacity as
EXECUTIVE DIRECTOR OF THE STATE
BOARD OF ELECTIONS,

Defendants,

and

NORTH CAROLINA ALLIANCE FOR
RETIRED AMERICANS, BARKER FOWLER,
BECKY JOHNSON, JADE JUREK, ROSALYN
KOCIEMBA, TOM KOCIEMBA, SANDRA
MALONE, and CAREN RABINOWITZ,

Civil Action No. 5:20-cv-505

(Proposed)
Intervenor-Defendants.

MOTION TO INTERVENE AS DEFENDANTS

Plaintiffs North Carolina Alliance for Retired Americans, Barker Fowler, Becky Johnson, Jade Jurek, Rosalyn Kociemba, Tom Kociemba, Sandra Malone, and Caren Rabinowitz, (the “Alliance Intervenors”) seek to participate as intervening defendants in the above-captioned lawsuit to safeguard the substantial and distinct legal interests of the Alliance Intervenors, which will otherwise be inadequately represented in the litigation. For the reasons discussed in the memorandum in support, filed concurrently herewith, the Alliance Intervenors are entitled to intervene in this case as a matter of right under Federal Rule of Civil Procedure 24(a)(2). In the alternative, the Alliance Intervenors request permissive intervention pursuant to Rule 24(b).

WHEREFORE, the Alliance Intervenors request that the Court grant them leave to intervene in the above-captioned matter and to file its proposed Answer.

Dated: October 2, 2020

Respectfully submitted,

s/ Uzoma N. Nkwonta

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Defendants*

**Notices of Special Appearance
Forthcoming*