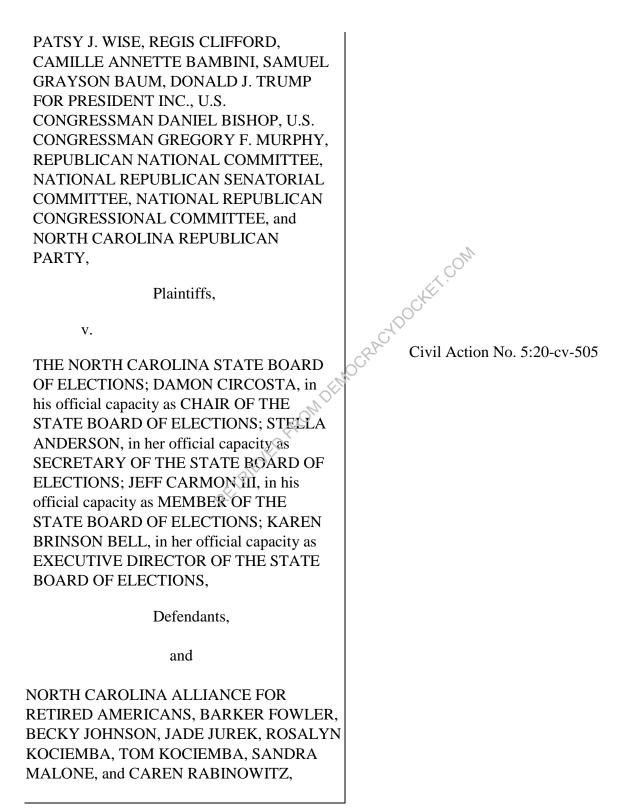
## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA WESTERN DIVISION



(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

Burton Craige, NC Bar No. 9180 Narendra K. Ghosh, NC Bar No. 37649 Paul E. Smith, NC Bar No. 45014 PATTERSON HARKAVY LLP 100 Europa Drive, Suite 420 Chapel Hill, NC 27517 Telephone: 919.942.5200 BCraige@pathlaw.com NGhosh@pathlaw.com PSmith@pathlaw.com

Marc E. Elias Uzoma N. Nkwonta Lalitha D. Madduri\*

Jyoti Jasrasaria\* Ariel B. Glickman\* PERKINS COIE LLP 700 Thirteenth Street, N.W., Suite 800 Washington, D.C. 20005 Telephone: 202.654.6200 Facsimile: 202.654.6211 MElias@perkinscoie.com UNkwonta@perkinscoie.com LMadduri@perkinscoie.com JJasrasaria@perkinscoie.com AGlickman@perkinscoie.com

Molly Mitchell\* PERKINS COIE LLP 1111 West Jefferson Street, Suite 500 Boise, Idaho 83702 Telephone: 208.343.3434 Facsimile: 208.343.3232 MMitchell@perksincoie.com

Attorneys fe Defendants \*Notic Fr Attorneys for Proposed Intervenor-

\*Notices of Special Appearance Forthcoming