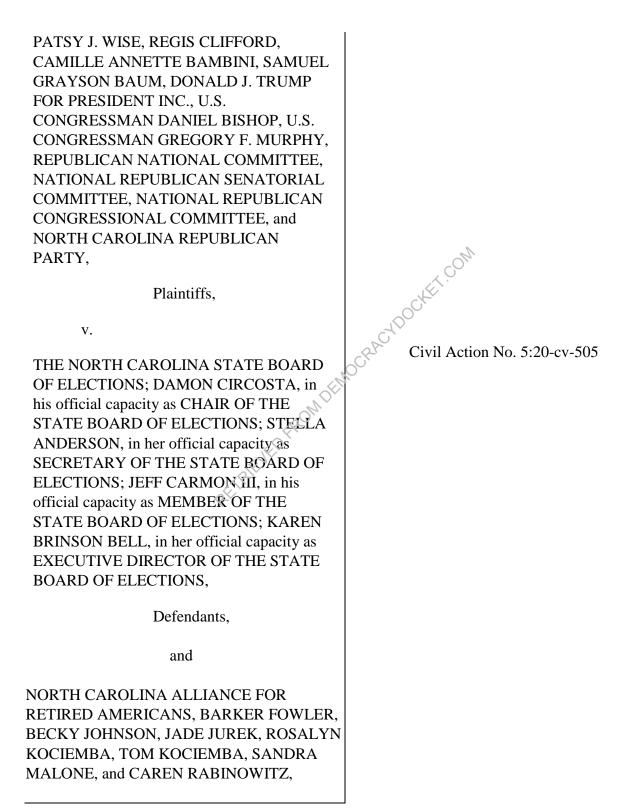
IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA WESTERN DIVISION



(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

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*Notices of Special Appearance Forthcoming