

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BELINDA DE GAUDEMAR, ANTHONY
HOFFMANN, SUSAN SCHOENFELD,
NANCY PASCAL, and MICHAEL CORBETT,

Plaintiffs,

v.

PETER S. KOSINSKI, in his official capacity as
Co-Chair of the State Board of Elections;
DOUGLAS A. KELLNER, in his official
capacity as Co-Chair of the State Board of
Elections; ANDREW J. SPANO, in his official
capacity as Commissioner of the State Board of
Elections; ANTHONY J. CASALE, in his
official capacity as Commissioner of the State
Board of Elections; TODD D. VALENTINE, in
his official capacity as Co-Executive Director of
the State Board of Elections; and KRISTEN
ZEBROWSKI-STAVISKY, in her official
capacity as Co-Executive Director of the State
Board of Elections,

Defendants,

TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA
CLARINO, GEORGE DOOHER, JR.,
STEPHEN EVANS, LINDA FANTON, JERRY
FISHMAN, JAY FRANTZ, LAWRENCE
GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, and
MARIANNE VOLANTE

Applicants in Intervention.

Case No. 22-cv-03534-LAK

**NOTICE OF MOTION TO
INTERVENE BY TIM
HARKENRIDER, GUY C.
BROUGHT, LAWRENCE
CANNING, PATRICIA
CLARINO, GEORGE DOOHER,
JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN,
JAY FRANTZ, LAWRENCE
GARVEY, ALAN NEPHEW,
SUSAN ROWLEY, JOSEPHINE
THOMAS, and MARIANNE
VOLANTE**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, Tim Harkenrider, Guy C. Brought, Lawrence Canning, Patricia Clarino, George Dooher, Jr., Stephen Evans, Linda Fanton, Jerry Fishman, Jay Frantz, Lawrence Garvey, Alan Nephew, Susan Rowley, Josephine Thomas, and Marianne Volante, will move this Court before the Hon. Lewis A. Kaplan, United States District Judge, at the Daniel Patrick Moynihan Courthouse, 500 Pearl Street, Rm. 21B, New York, NY 10007, at a time to be scheduled by this Court, for an order pursuant to Federal Rule of Civil Procedure 24 granting their Motion to Intervene. As set forth in the accompanying Memorandum of Law, Proposed Intervenors seek intervention as of right, or, in the alternative, permissive intervention pursuant to Federal Rules of Civil Procedure 24(a) and 24(b), respectively.

Proposed Intervenors further file with this Notice of Motion as exhibits their proposed Answer to Plaintiffs' Complaint (Exhibit 1), as well as their proposed Opposition To Plaintiffs' Application For A Temporary Restraining Order And Motion For Preliminary Injunction (Exhibit 2).

Dated: New York, New York.
May 3, 2022

Respectfully submitted,

By: /s/Bennet J. Moskowitz

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Attorneys for Proposed Intervenors

**pro hac vice pending*

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of May, 2022, a true and accurate copy of the foregoing was served via the Court's CM/ECF system upon all counsel of record.

By: /s/Bennet J. Moskowitz

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