

**STATE OF MINNESOTA****DISTRICT COURT****COUNTY OF RAMSEY****SECOND JUDICIAL DISTRICT**

Minnesota Alliance for Retired Americans  
Educational Fund, Teresa Maples, and Khalid  
Mohamed,

Case Type: Civil Other/Misc.  
Case No. 62-cv-24-854  
Judge Edward Sheu

Plaintiffs,

v.

**NOTICE OF INTERVENTION**

Steve Simon, in his official capacity as  
Minnesota Secretary of State,

Defendant,

Republican National Committee and  
Republican Party of Minnesota,

Intervenors.

TO: Plaintiffs above-named and their counsel, Sybil L. Dunlop and Amran A. Farah of Green Espel PLLP, 222 S. Ninth Street, Suite 2200, Minneapolis, MN 55402; sdunlop@greeneespel.com, afarah@greeneespel.com, Uzoma N. Nkwonta, Richard A. Medina, William K. Hancock, and Marisa A. O’Gara of Elias Law Group LLP, 250 Massachusetts Ave. N.W., Suite 400, Washington, D.C. 20001, unkwonta@elias.law, rmedina@elias.law, whancock@elias.law, mogara@elias.law

Defendant above-named and his counsel, Attorney General Keith M. Ellison, Assistant Attorneys General Angela Behrens, Allen Cook Barr, Emily B. Anderson, Madeleine DeMeules, and Sarah Doktori, 445 Minnesota Street, Suite 1400, St. Paul, MN 55101, angela.behrens@ag.state.mn.us, allen.barr@ag.state.mn.us, emily.anderson@ag.state.mn.us, madeleine.demeules@ag.state.mn.us, sarah.doktori@ag.state.mn.us

The Republican National Committee and Republican Party of Minnesota support and seek to uphold free and fair elections for all Minnesotans and for all voters across the country.

PLEASE TAKE NOTICE, therefore, that the Republican National Committee and Republican Party of Minnesota (collectively, “Republican Committees” or “Intervenors”), respectively the national committee and a state committee of the Republican Party, seek to intervene as defendants in the above-captioned matter under Minnesota Rules of Civil Procedure

24.01 and 24.02. This notice of intervention is timely.

The Republican Committees are entitled, under Rule 24.01, to intervene of right in this action. The Republican Committees have made significant contributions and expenditures in support of Republican candidates up and down the ballot in Minnesota for the past many election cycles, and intend to do so again in 2024. They thus have a substantial and particularized interest in defending this action to preserve the structure of the competitive environment in which their supported candidates participate and to ensure that Minnesota carries out free and fair elections. The disposition of this action may as a practical matter impair or impede the Republican Committees' ability to protect that interest. Moreover, the existing parties do not adequately represent the Republican Committees' interests.

Alternatively, the Republican Committees should be granted permissive intervention under Rule 24.02. The Republican Committees' arguments and defenses have questions of fact and law in common with the claims of Plaintiffs. Intervention, moreover, will not unduly delay or prejudice the adjudication of the rights of the existing parties.

As required by Rule 24.03, this notice is accompanied by a pleading, in the form of an answer to Plaintiffs' Complaint, setting forth the reasons for the claim of entitlement to intervention and the nature and extent of the defenses for which intervention is sought.

Please be advised that pursuant to Rule 24.03, in the absence of an objection by one of the existing parties within thirty (30) days after service of this notice, the Republican Committees' intervention will be deemed accomplished. In the event of an objection, as directed under Minn. R. Civ. P. 24.03, the Republican Committees will move the Court for leave to intervene in this action within thirty (30) days of such objection.

DATED: March 15, 2024

Respectfully submitted,

/s/Benjamin L. Ellison

Benjamin L. Ellison (#392777)

JONES DAY

90 South Seventh Street, Suite 4950

Minneapolis, MN 55402

Phone: (612) 217-8800

Fax: (844) 345-3178

bellison@jonesday.com

John M. Gore \*

E. Stewart Crosland \*

Louis J. Capozzi III\*

JONES DAY

51 Louisiana Avenue, N.W.

Washington, D.C. 20001

Phone: (202) 879-3939

Fax: (202) 626-1700

jmgore@jonesday.com

scrosland@jonesday.com

lcapozzi@jonesday.com

*Counsel for Intervenors the Republican  
National Committee and Republican Party of  
Minnesota*

\*motion for admission pro hac vice  
forthcoming