

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JUDICIAL WATCH, INC.; ILLINOIS
FAMILY ACTION; BREAKTHROUGH
IDEAS; and CAROL J. DAVIS,

Plaintiffs,

v.

THE ILLINOIS STATE BOARD OF
ELECTIONS; and BERNADETTE
MATTHEWS, in her capacity as the
Executive Director of the Illinois State Board
of Elections,

Defendants.

No. 1:24-cv-01867

Hon. Sara L. Ellis

**ILLINOIS AFL-CIO AND ILLINOIS FEDERATION OF TEACHERS' MOTION TO
INTERVENE AS DEFENDANTS**

Pursuant to Federal Rule of Civil Procedure 24, the Illinois AFL-CIO and the Illinois Federation of Teachers (“Proposed Intervenors”) move to intervene as defendants in this action. As further explained in the accompanying memorandum in support, Proposed Intervenors are entitled to intervene in this matter. This motion is undeniably timely: the matter was only recently initiated, the named Defendants have not yet responded to the Complaint, the initial status conference is scheduled for several weeks from now, and nothing of substance has occurred in the case. Proposed Intervenors meet the requirements for intervention as of right under Rule 24(a)(2) because they have interests relating to the subject matter of the action that will be impaired if Plaintiffs are successful, and those interests are not adequately represented by the existing parties.

In the alternative, Proposed Intervenors request that the Court grant them permissive intervention under Rule 24(b).

Per this Court's Standing order on Motions Practice, counsel for Proposed Intervenors conferred with the parties on this motion via telephone and email. Proposed Intervenors have been advised that Plaintiffs oppose the motion to intervene, and Defendants take no position.

WHEREFORE, Proposed Intervenors request that the Court grant them leave to intervene in the above-captioned matter and to file their proposed motion to dismiss (Ex. 1).¹

April 2, 2024

Respectfully Submitted,

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By: s/ Sarah F. Weiss

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¹ Proposed Intervenors also include a proposed answer (Ex. 2), out of an abundance of caution, pursuant to Federal Rule of Civil Procedure 24(c)'s requirement that a motion to intervene "be accompanied by a *pleading* that sets out the claim or defense for which intervention is sought." (emphasis added).

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**Pro hac vice application forthcoming*

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CERTIFICATE OF SERVICE

I, Sarah F. Weiss, certify that on April 2, 2024, I electronically filed the foregoing **MOTION TO INTERVENE AS DEFENDANTS** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record.

I certify under penalty of perjury that the foregoing is true and correct.

/s/ Sarah F. Weiss

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