UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

REPUBLICAN NATIONAL COMMITTEE, JORDAN JORRITSMA, and EMERSON SILVERNAIL,

Plaintiffs,

v.

JOCELYN BENSON, in her official capacity as Michigan Secretary of State; and JONATHAN BRATER, in his official capacity as Director of the Michigan Bureau of Elections,

Defendants.

CIVIL ACTION

Case No. 1:24-cv-262-JMB-RSK

Hon. Jane M. Beckering

PROPOSED INTERVENOR-DEFENDANTS' MOTION TO INTERVENE

ORAL ARGUMENT REQUESTED

Proposed Intervenor-Defendants Detroit Disability Power and the Michigan Alliance for Retired Americans (together, "Proposed Intervenors") seek to intervene as defendants in the above-captioned lawsuit to safeguard their and their members' substantial and distinct legal interests, which will otherwise be inadequately represented. For the reasons discussed in the memorandum in support, filed herewith, Proposed 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, Proposed Intervenors request permissive intervention under Rule 24(b).

Proposed Intervenors respectfully request that the Court set a schedule regarding this motion to intervene that allows for their participation in any future briefing or hearings. Otherwise,

Case 1:24-cv-00262-JMB-RSK ECF No. 9, PageID.103 Filed 03/22/24 Page 2 of 22

Proposed Intervenors' fundamental constitutional rights are at risk of being severely and irreparably harmed, as described more fully in the memorandum in support of this motion.

Pursuant to Local Rule 7.1(d) and Section III(B) of this Court's Information and Guidelines for Civil Practice, counsel for Proposed Intervenors conferred with counsel for Plaintiffs and Defendants about their positions on this motion. On March 21, 2024, counsel for Defendants confirmed that they neither oppose nor concur with the relief requested. On March 22, 2024, counsel for Plaintiffs confirmed that they will state their position after reviewing the filed motion and memorandum.

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).

25 REFERENCE PROMILEMOCRACIO

Dated: March 22, 2024.

Respectfully submitted,

/s/ Sarah S. Prescott

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Counsel for Proposed Intervenor-Defendants

*Admission pending

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Case 1:24-cv-00262-JMB-RSK ECF No. 9, PageID.105 Filed 03/22/24 Page 4 of 22

CERTIFICATE OF SERVICE

I certify that on this 22nd day of March 2024, I caused to be served a copy of the above document on all counsel of record and parties via the ECF system.

/s/ Sarah S. Prescott

Sarah S. Prescott

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