

FILED
05-29-2024
Clerk of Court
Marinette County
2024CV000043

STATE OF WISCONSIN CIRCUIT COURT MARINETTE COUNTY

THOMAS OLDENBURG,

Plaintiff,

v.

WISCONSIN ELECTIONS
COMMISSION et al.,

Defendants.

Case No. 24-CV-43

Case Code: 30701

Hon. James A. Morrison

**NOTICE OF MOTION AND MOTION TO INTERVENE OF PROPOSED
INTERVENOR-DEFENDANTS DEMOCRATIC NATIONAL COMMITTEE
AND KATHLEEN F. EASTMAN**

To: All Counsel of Record

PLEASE TAKE NOTICE THAT, pursuant to Wis. Stat. § 803.09, Proposed Intervenor-Defendants Democratic National Committee and Kathleen F. Eastman (“Proposed Intervenor”), by their undersigned counsel, hereby move to intervene as Defendants in this action and ask the Court to consider their Motion on June 5, 2024, or at the earliest convenient opportunity.

Proposed Intervenor seek intervention as of right under Wis. Stat § 803.09(1) or, alternatively, permissive intervention under Wis. Stat. § 803.09(2). In support of this Motion, Proposed Intervenor are filing a companion brief, supporting declarations, and a proposed order. Proposed Intervenor will also lodge a proposed response in opposition to Plaintiff’s motion for judgment on the pleadings. (Dkt. 23)

Consistent with Wis. Stat. § 803.09(3), Proposed Intervenor also submit as Exhibit A to this Motion their proposed Answer and Affirmative Defenses to Plaintiff’s Complaint.

Accordingly, and for the reasons set forth in the accompanying materials, Proposed Intervenor respectfully move the Court to intervene as Defendants in this matter.

Dated: May 29, 2024

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Respectfully submitted,

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**Motion for Admission Pro Hac Vice
forthcoming*

*Attorneys for Proposed Intervenor-Defendants
Democratic National Committee and Kathleen F. Eastman*

CERTIFICATE OF SERVICE

I certify that, in compliance with Wis. Stat. § 801.18(6), I am electronically filing this Notice of Motion and Motion to Intervene of Proposed Intervenor-Defendants Democratic National Committee and Kathleen F. Eastman (with attached Exhibit A) with the Clerk of Court using the Wisconsin Circuit Court Electronic Filing System, which will accomplish electronic notice and service for all participants who are registered users.

Respectfully submitted this 29th day of May, 2024.

Electronically signed by Charles G. Curtis, Jr.
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