

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

NEW HAMPSHIRE YOUTH MOVEMENT,
Plaintiff,

v.

DAVID M. SCANLAN, in his official capacity
as New Hampshire Secretary of State,
Defendant.

Case No. 1:24-cv-00291

PROPOSED INTEVENOR-DEFENDANTS' MOTION
FOR LEAVE TO FILE REPLY MEMORANDUM

NOW COME proposed Intevernor-Defendants Republican National Committee and New Hampshire Republican State Committee, and respectfully move for leave to file a reply memorandum in responses to Plaintiff's objection to proposed intervenor-defendants' motion to intervene, and in support thereof state as follows:

1. As set forth more fully in Proposed Intervenor-Defendants' reply memorandum, Intervenor-Defendants, Proposed Intervenor-Defendants are entitled to intervene as of right and likewise easily meet the legal standard for permissive intervention under Rule 24.

2. Further, none of the other grounds that might advise the Court to exercise its jurisdiction against intervention are present here. In particular, Proposed intervenor-defendants motion is timely and will cause no hardship for any other party.

3. Finally, and in addition to reasons set forth by the proposed intervenor-defendants, as political parties, both Republican National Committee and the New Hampshire Republican State Committee have interests relative to their members and candidates that may diverge from the interests of the state defendants.

4. Counsel for the Plaintiffs objects to the relief requested in this motion; and

5. Counsel for the State takes no position on the relief requested herein.

CONCLUSION

For the foregoing reasons, the Court should:

- A. Grant this motion for leave to file a reply brief; and
- B. Grant the previously filed motion to intervene, and
- C. Grant such other relief as may be just and proper

This 13th day of December, 2024.

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Respectfully submitted,

/s/ Richard J. Lehmann

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Counsel for Movants

CERTIFICATION

I hereby certify that copies of this pleading were forwarded to all counsel of record via the court's e-filing page.

December 13, 2024

/s/ Richard J. Lehmann

Richard J. Lehmann