

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
MACON DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

HOUSTON COUNTY and DAN PERDUE, SHANE  
GOTTWALS, GAIL ROBINSON, TAL TALTON,  
and MARK BYRD, in their official capacities as  
members of the Houston County Board of  
Commissioners,

Defendants.

Civil Action No. 5:25-cv-25

**UNITED STATES' RESPONSE TO MOTION TO INTERVENE**

The United States respectfully responds to the Motion to Intervene filed by Courtney Driver and Mike Jones. Mot. to Intervene, ECF No. 7. The United States does not oppose Movant-Intervenor's request for permissive intervention under Federal Rule of Civil Procedure 24(b)(1).<sup>1</sup>

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<sup>1</sup> Movant-Intervenors are not entitled to intervention of right under Rule 24(a)(2). *See, e.g., Stone v. First Union Corp.*, 371 F.3d 1305, 1311 (11th Cir. 2004) (recognizing that intervention of right is presumptively unavailable when an existing party "seeks the same objectives as the interveners" and cannot be had in the absence of collusion with an opposing party, adverse interests, or a failure "in fulfillment of his duty").

Date: February 14, 2025

Respectfully submitted,

KATHLEEN WOLFE  
Deputy Assistant Attorney General  
Civil Rights Division

/s/ Daniel J. Freeman

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