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*\*Application for admission pending*  
*\*\*Application for admission forthcoming*  
*\*\*\*Pro hac vice application forthcoming*

*Counsel for Proposed Intervenors*  
*Vet Voice Foundation and California*  
*Alliance for Retired Americans*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

DARRELL ISSA,

Plaintiff,

v.

SHIRLEY N. WEBER, in her official  
capacity as Secretary of State of  
California,

Defendant.

Case No.: 25-cv-598-AGS-JLB

**VET VOICE FOUNDATION AND  
THE CALIFORNIA ALLIANCE FOR  
RETIRED AMERICANS' MOTION  
TO INTERVENE AS DEFENDANTS**

DATE: May 16, 2025

TIME: 2:00 P.M.

COURTROOM: 5C

JUDGE: Hon. Andrew G. Schopler

1 Pursuant to Federal Rule of Civil Procedure 24, Vet Voice Foundation (“Vet Voice”)  
2 and the California Alliance for Retired Americans (“CARA”) respectfully move to  
3 intervene as a matter of right in the above-captioned matter as Defendants. Vet Voice and  
4 CARA are entitled to intervene as of right because their motion is timely, they have direct  
5 and legally protectable interests in this action, disposition of this case could impair their  
6 ability to protect such interests, and they are not adequately represented by the existing  
7 parties.

8 Alternatively, pursuant to Rule 24(b), Vet Voice and CARA respectfully move for  
9 permissive intervention as, again, their motion is timely, intervention will not unduly delay  
10 or prejudice the existing parties, and Vet Voice and CARA’s defenses and the main action  
11 have questions of law and fact in common. Furthermore, allowing Vet Voice and CARA  
12 to intervene in this matter will assist the Court in adjudicating this matter, where Vet Voice  
13 and CARA would be the only parties specifically representing the types of voters most  
14 likely to be disenfranchised if Plaintiff succeeds. These are military and veteran voters and  
15 older voters, many of whom have disabilities that make it impossible for them to vote in  
16 person, even in districts where that is an option. Vet Voice in particular has been a party in  
17 several prior cases in which plaintiffs brought challenges to other states’ ballot receipt  
18 deadlines under identical theories. As a result, Proposed Intervenors bring a critical and  
19 unique perspective to this litigation that will otherwise be unrepresented, absent their  
20 intervention.

21 In support of this motion, Vet Voice and CARA attach a memorandum brief of points  
22 and authorities setting forth the reasons warranting their intervention under Rule 24, along  
23 with declarations from Janessa Goldbeck, Chief Executive Officer of Vet Voice, and  
24 Robert England, Executive Director of CARA, as exhibits to this motion. In compliance  
25 with Rule 24(c), Vet Voice and CARA also attach to this motion a proposed Answer but  
26 reserve the right to file a motion to dismiss Plaintiff’s complaint if intervention is granted.

1 Plaintiff objects to Vet Voice and CARA's motion to intervene, and Defendant  
2 takes no position.

3 Dated: April 4, 2025

Respectfully submitted,

4 s/ Max Schoening

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21 *Counsel for Proposed Intervenors*

22 *Vet Voice Foundation and California*

23 *Alliance for Retired Americans*

**Certificate of Compliance**

Per Civil Chamber Rule 5(a), counsel for Vet Voice and CARA met and conferred by videoconference with counsel for Plaintiff on Thursday, April 3, 2025. Counsel for Vet Voice and CARA met and conferred by videoconference with counsel for Defendant on Wednesday, April 2, 2025. Defendant informed Vet Voice and CARA's counsel of their position on Thursday, April 3, 2025.

s/ Max Schoening  
Max A. Schoening

*Counsel for Proposed Intervenors  
Vet Voice Foundation and California  
Alliance for Retired Americans*