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Counsel for Proposed Intervenor-Defendant
League of Women Voters of California

**Application for admission pro hac vice forthcoming*

***Application for admission forthcoming*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

DARRELL ISSA,

Plaintiff,

vs.

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

Defendant.

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

**NOTICE OF MOTION AND
MOTION FOR INTERVENTION
OF LEAGUE OF WOMEN
VOTERS OF CALIFORNIA**

DATE: May 16, 2025

TIME: 2:00 P.M.

COURTROOM: 5C

JUDGE: Hon. Andrew G. Schopler

1 Please take notice that on May 16, 2025 at 2:00 pm, or as soon thereafter as
2 the matter maybe heard, in the courtroom of and before the Honorable Andrew G.
3 Schopler, in Courtroom 5C, located at 221 West Broadway, San Diego, CA 92101,
4 proposed Intervenor-Defendant the League of Woman Voters of California (the
5 “League”) will and hereby does move the Court for an order granting them
6 intervention as defendant in this case under Federal Rule of Civil Procedure 24.

7 Proposed Intervenor-Defendant the League, a non-partisan, grassroots
8 organization with over 7,000 members across the State, moves to intervene in this
9 action to safeguard the rights of League members to vote and have that vote
10 counted, and to protect the League’s institutional and organizational interests in
11 promoting civic participation and access to the ballot in California.

12 Proposed Intervenor-Defendant is entitled to intervene as of right under
13 Federal Rule of Civil Procedure 24(a)(2) because: (i) the motion is timely, filed
14 before any substantive deadlines in the case; (ii) the League has a substantial legal
15 interest in the subject matter of the pending action; and (iii) the named Defendant
16 may not adequately represent Intervenor-Defendant’s interests. In addition, the
17 League’s participation will assist the Court and provide a critically valuable
18 perspective on the mail ballot process in California.

19 Alternatively, the Court should permit the League to intervene under Federal
20 Rule of Civil Procedure 24(b)(1)(B) because such intervention is timely and will
21 not prejudice the other parties and because the Intervenor-Defendant’s defenses
22 share common questions of law and fact with the main action.

23 In support of this motion, the League attaches a memorandum of points and
24 authorities setting forth the reasons warranting intervention under Rule 24, along
25 with a declaration from Helen Hutchison. In compliance with Rule 24(c), the
26 League also attaches to this motion a proposed Answer but reserves the right to file
27 a motion to dismiss Plaintiff’s complaint according to the schedule entered by this
28 Court if intervention is granted.

1 Plaintiff opposes the League's motion to intervene, and Defendant takes no
2 position.

3
4 Dated: April 18, 2025

Respectfully submitted,

5
6 /s/ Julia A. Gomez
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Certificate of Compliance

Per Civil Chamber Rule 5(a), counsel for the League met and conferred by videoconference with counsel for Plaintiff on April 18, 2025. Counsel for the League met and conferred by videoconference with counsel for Defendant on April 16, 2025.

Dated: April 18, 2025

/s/ Julia A. Gomez

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