UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NORTH CAROLINA WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

NORTH CAROLINA STATE BOARD OF ELECTIONS; SAM HAYES, in his official capacity as Executive Director of the North Carolina State Board of Elections; FRANCIS X. DE LUCA, JEFF CARMON, STACY EGGERS IV, SIOBHAN O'DUFFY MILLEN, and ROBERT RUCHO, in their official capacities as Members of the North Carolina State Board of Elections; and STATE OF NORTH CAROLINA,

Defendants.

Case No. 5:25-cv-00283

THE NORTH CAROLINA ALLIANCE FOR RETIRED AMERICANS' MOTION TO INTERVENE AS DEFENDANT

The North Carolina Alliance for Retired Americans ("the Alliance") submits this motion to intervene as defendant, requesting that the Court allow it to intervene as of right pursuant to Fed. R. Civ. P. 24(a) or, alternatively, Fed. R. Civ. P. 24(b). In support of this motion, the Alliance relies on the bases and authorities set forth in the attached memorandum in support, in addition to the attached declaration.

Dated: June 2, 2025.

Respectfully submitted,

<u>/s/ Narendra K. Ghosh</u> Narendra K. Ghosh N.C. Bar No. 37649 PATTERSON HARKAVY LLP 100 Europa Drive, Suite 420 Chapel Hill, NC 27217 Telephone: (919) 942-5200 nghosh@pathlaw.com Lalitha D. Madduri* Christopher D. Dodge* Tina Meng Morrison* James J. Pinchak* ELIAS LAW GROUP LLP 250 Massachusetts Ave, N.W., Suite 400 Washington, D.C. 20001 Telephone: (202) 968-4490 Imadduri@elias.law cdodge@elias.law tmengmorrison@elias.law jpinchak@elias.law

*Notice of Special Appearance Forthcoming

Counsel for Proposed Intervenor the North Carolina Alliance for Retired Americans

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served on Plaintiff via

CM/ECF, and was served via mail to defendants at the following addresses:

Paul Cox General Counsel NC State Board of Elections 6400 Mail Service Center Raleigh, NC 27699-6400

Jeff Jackson Attorney Geneal P.O. Box 629 Raleigh, NC 27602

Dated: June 2, 2025.

/s/ Narendra K. Ghosh Narendra K. Ghosh, NC Bar No. 37649 nghosh@pathlaw.com PATTERSON HARKAVY LLP 100 Europa Dr., Suite 420 Chapel Hill, NC 27517 Tel: (919) 942-5200

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