

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

RED WINE & BLUE, and OHIO ALLIANCE  
FOR RETIRED AMERICANS,

*Plaintiffs,*

v.

FRANK LAROSE, in his official capacity as  
Ohio Secretary of State, CHARLES L.  
NORMAN, in his official capacity as Ohio's  
Registrar of Motor Vehicles,

*Defendants,*

REPUBLICAN NATIONAL COMMITTEE,

*Proposed Intervenor-Defendant.*

FILED

SEP 24 2025

CLERK U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO CLEVELAND

Case No: 1:25-cv-01760

**MOTION TO INTERVENE**

The Republican National Committee (RNC) respectfully moves to intervene as a Defendant in this case. As explained in the accompanying brief, the RNC satisfies the requirements for intervention of right under Federal Rule of Civil Procedure Rule 24(a)(2) and permissive intervention under Federal Rule of Civil Procedure 24(b). Counsel for Plaintiffs represents that Plaintiffs opposes the motion. Counsel for Defendants consents to the motion.

Dated: September 23, 2025

Respectfully submitted,

*/s/ Thomas R. McCarthy*

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\*Permission to practice *pro hac vice*  
motion submitted.

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The Republican National Committee*

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on September 23, 2025, the foregoing was mailed to the Clerk of Court who will send an electronic notice of filing to all counsel of record.

*/s/ Thomas R. McCarthy*

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