

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

COMMONWEALTH OF PENNSYLVANIA; and AL
SCHMIDT, in his official capacity as Secretary of the
State of Pennsylvania,

Defendants.

Case No. 2:25-CV-01481

Hon. Cathy Bissoon

**NOTICE OF MOTION
OF THE NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED
PEOPLE, THE NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF
COLORED PEOPLE PENNSYLVANIA STATE CONFERENCE, AND STACEY
TAYLOR’S MOTION TO INTERVENE AS DEFENDANTS**

Proposed Intervenors the National Association for the Advancement of Colored People (“NAACP”), the NAACP Pennsylvania State Conference (“State Conference”), and Stacey Taylor (together, “Proposed Intervenors”) hereby move, through undersigned counsel, to intervene as defendants in this matter to defend their and their members’ significant interests, which are otherwise not adequately represented and stand to be impaired by this litigation.

For the reasons discussed in the supporting memorandum filed alongside this Motion, and the Declarations attached thereto, Proposed Intervenors are entitled to intervene in this case as a matter of right under Federal Rule of Civil Procedure 24(a)(2). In the alternative, Proposed Intervenors request permissive intervention pursuant to Rule 24(b). Pursuant to Rule 24(c), a Proposed Answer is also attached to this Motion.¹

¹ Proposed Intervenors respectfully request leave to file a Rule 12(b) motion within the time period prescribed by the Federal Rules of Civil Procedure or pursuant to any schedule set by this Court.

WHEREFORE, the Proposed Intervenor respectfully request that the Court grant their intervention in the above-captioned matter.

Dated: October 7, 2025

Respectfully submitted,

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**Pro hac vice application forthcoming*

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