

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAVID M. SCANLAN in his official
capacity as Secretary of State for the State of
New Hampshire, and the STATE OF NEW
HAMPSHIRE,

Defendants.

Case No. 1:25-cv-00371-AJ

**NEAL KURK, ROBERT “BOB” PERRY, LOUISE SPENCER, AND
CHRISTOPHER COLE’S MOTION TO INTERVENE AS DEFENDANTS**

NOW COME Proposed Intervenors Neal Kurk, Robert “Bob” Perry, Louise Spencer, and Christopher Cole, by and through counsel, and move to intervene as defendants in this matter pursuant to Rules 24(a) and 24(b) of the Federal Rules of Civil Procedure.

WHEREFORE, for the reasons stated in Proposed Intervenors’ attached Memorandum of Law in Support of Motion to Intervene, which is incorporated herein by reference, Neal Kurk, Robert “Bob” Perry, Louise Spencer, and Christopher Cole respectfully request that this Honorable Court GRANT their Motion to Intervene as Defendants and further ORDER that they be permitted to participate in this action as Defendants.

Dated: September 30, 2025

Respectfully submitted,

/s/ Steven J. Dutton

Steven J. Dutton, NH Bar No. 17101
McLANE MIDDLETON, P.A.
900 Elm Street

Manchester, New Hampshire 03101
Telephone: (603) 625-6464
steven.dutton@mclane.com

Paul Twomey, NH Bar No. 2589
TWOMEY LAW OFFICE
PO Box 623
Epsom, New Hampshire 03234
Telephone: (603) 568-3254
polotuama7@gmail.com

Elisabeth C. Frost*
David R. Fox*
Christopher D. Dodge*
Marcos Mocine-McQueen*
ELIAS LAW GROUP LLP
250 Massachusetts Ave NW, Suite 400
Washington, D.C. 20001
Telephone: (202) 968-4490
efrost@elias.law
dfox@elias.law
cdodge@elias.law
mmcqueen@elias.law

Walker McKusick*
ELIAS LAW GROUP LLP
1700 Seventh Avenue, Suite 2100
Seattle, Washington 98101
(206) 656-0177
wmckusick@elias.law

Counsel for Plaintiff

** Pro Hac Vice Applications Forthcoming*

LOCAL RULE 7.1(C) CERTIFICATION

Proposed Intervenors made a good-faith attempt to obtain concurrence from both the Plaintiff and the named Defendants as to the relief sought in this Motion but was unable to obtain concurrence.

/s/ Steven J. Dutton

CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2025, the foregoing document was served via ECF filing on all counsel of record.

/s/ Steven J. Dutton

RETRIEVED FROM DEMOCRACYDOCKET.COM