

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

UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

Case No. 2:25-cv-01481-CB

COMMONWEALTH OF)

PENNSYLVANIA; and AL SCHMIDT, in)

his official capacity as Secretary of the)

State of Pennsylvania)

Defendants.)

MOTION TO INTERVENE AS PLAINTIFF OF AMERICA FIRST POLICY
INSTITUTE – PENNSYLVANIA

Under Federal Rule of Civil Procedure 24(a)(2) and, alternatively, under Federal Rule of Civil Procedure 24(b), proposed intervenor plaintiff, American First Policy Institute – Pennsylvania, respectfully moves for an order granting its motion to intervene as a plaintiff. In support of its motion, plaintiff relies upon the accompanying brief and Declaration of Mary Stiffler. A proposed form of order and complaint are filed herewith.

Respectfully submitted,

Dated: November 19, 2025

/s/Walter S. Zimolong
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*(application for admission pro hac vice
forthcoming)*

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CERTIFICATE OF SERVICE

I hereby certify the foregoing has been filed electronically and is available for viewing and downloading from the Electronic Case Filing System of the United States District Court for the Western District of Pennsylvania.

Date: November 19, 2025

/s/ Walter S. Zimolong

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