

**IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF ILLINOIS
SPRINGFIELD DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

BERNADETTE MATTHEWS, *in her official
capacity as Executive Director of the State
Board of Elections for the State of Illinois,*

Defendant.

Case No. 3:25-cv-3398-CRL-DJQ

**ILLINOIS AFL-CIO, ILLINOIS ALLIANCE FOR RETIRED AMERICANS, AND
ILLINOIS FEDERATION OF TEACHERS' MOTION TO INTERVENE AS
DEFENDANTS**

Pursuant to Federal Rule of Civil Procedure 24(a), the Illinois AFL-CIO, Illinois Alliance for Retired Americans, and Illinois Federation of Teachers move to intervene as of right as Defendants in this case. As set forth in the attached memorandum, Proposed Intervenors' motion is timely, they have related interests that may be impaired by this litigation, and none of the existing parties adequately represent their interests. They are therefore entitled to intervene as of right. *See Driftless Area Land Conservancy v. Huebsch*, 969 F.3d 742, 746 (7th Cir. 2020).

In the alternative, Proposed Intervenors should be granted permissive intervention pursuant to Rule 24(b). The defenses Proposed Intervenors raise share "a common question of law or fact" with the existing action, and intervention will not "unduly delay or prejudice the adjudication of the original parties' rights." Fed. R. Civ. P. 24(b).

Wherefore, for the foregoing reasons, Proposed Intervenors respectfully request that their motion be granted.

Dated: December 22, 2025

/s/ Sarah Grady
Sarah Grady
Counsel for Proposed-Intervenors

Sarah Grady
John Hazinski
Adam Smith
KAPLAN & GRADY LLC
2071 N. Southport Ave., Ste. 205
Chicago, IL 60614
sarah@kaplangrady.com
Tel: (312) 852-2184

Elisabeth Frost*
Katie Chamblee-Ryan*
Tina Meng Morrison*
ELIAS LAW GROUP LLP
250 Massachusetts Avenue NW, Suite 400
Washington, D.C. 20001
efrost@elias.law
kchambleeryan@elias.law
tmengmorrison@elias.law
Tel: (202) 968-4652

Counsel for Proposed-Intervenors

*Pro Hac Vice applications forthcoming

RETRIEVED FROM DEMOCRACYDOCKET.COM

CERTIFICATE OF SERVICE

I, Sarah Grady, an attorney, certify that on December 22, 2025, I caused the foregoing to be filed using the Court's CM/ECF system, which effected service on all counsel of record. I further certify that within one (1) business day of filing, I will serve a copy of the foregoing via certified U.S. mail to:

Bernadette Matthews, in her Official Capacity as
Executive Director of the State Board of Elections
for the State of Illinois
69 W. Washington St., Ste. LL08
Chicago, IL 60602

/s/ Sarah Grady _____
Sarah Grady
Counsel for Proposed Intervenors

RETRIEVED FROM DEMOCRACYDOCKET.COM