

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANTHONY ALBENCE, in his official
capacity as State Election Commissioner for
the State of Delaware,

Defendant.

Case No. 25-cv-01453-RGA

Hon. Richard G. Andrews

**BETHANY JENNINGS AND GEMMA LOWERY'S MOTION TO INTERVENE AS
DEFENDANTS**

Proposed Intervenors Bethany Jennings and Gemma Lowery move to intervene as defendants in this matter to defend their significant interests that stand to be impaired by this litigation.

For the reasons discussed in the supporting brief 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

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

December 18, 2025

Respectfully submitted,

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.

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**Pro Hac Vice Applications Forthcoming*

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