

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

SARAH COPELAND HANZAS, in her
official capacity as Secretary of State of
Vermont,

Defendant.

Case No. 2-25-cv-00903

**PROPOSED INTERVENOR-DEFENDANTS VERMONT ALLIANCE FOR RETIRED
AMERICANS, RICHARD MONTEROSSO, AND MARY ANDREWS' MOTION TO
INTERVENE**

The Vermont Alliance for Retired Americans, Richard Monterosso, and Mary Andrews (together, "Proposed Intervenor") hereby move, through undersigned counsel, to intervene as defendants in this matter to defend their and their members' significant interests, which are otherwise inadequately represented.

For the reasons discussed in the supporting memorandum filed alongside this Motion, Proposed Intervenor is entitled to intervene in this case as a matter of right under Federal Rule of Civil Procedure 24(a)(2). In the alternative, Proposed Intervenor requests permissive intervention pursuant to Rule 24(b). Moreover, pursuant to Rule 24(c), Proposed Intervenor files a Proposed Answer attached to this Motion as a proposed pleading.¹

¹ Proposed Intervenor attaches a proposed answer to this Motion in compliance with Rule 24(c) but intends 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.

Consistent with Local Rule 7(a)(7), Proposed Intervenors have conferred with the existing parties over email. Counsel for Plaintiff informed counsel for Proposed Intervenors that Plaintiff takes no position on this motion. Counsel for Proposed Intervenors were unable to contact counsel for Defendant because no counsel for Defendant has entered an appearance in this matter.

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

Dated: December 11, 2025

Respectfully submitted,

/s/ Joshua C. Abbuhl

Marc E. Elias*

David R. Fox*

Joshua Abbuhl

Julianna D. Astarita*

Kevin Kowalewski*

ELIAS LAW GROUP LLP

250 Massachusetts Ave. NW, Suite 400

Washington, DC 20001

T: (202) 968-4490

F: (202) 968-4498

melias@elias.law

dfox@elias.law

jabbuhl@elias.law

jastarita@elias.law

kkowalewski@elias.law

** Pro Hac Vice Applications Forthcoming*

Counsel for Proposed Intervenor-Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served this 11th day of December, 2025, with a copy of this document via the Court's CM/ECF system. All other counsel will be served in accordance with Federal Rule of Civil Procedure 5(a).

/s/ Joshua C. Abbuhl
Joshua C. Abbuhl

RETRIEVED FROM DEMOCRACYDOCKET.COM