

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 3:26-CV-00021

STEPHANIE THOMAS, in her Official
Capacity as Secretary of the State of
Connecticut,

Defendant.

**SEIU DISTRICT 1199NE, CONNECTICUT ALLIANCE FOR RETIRED
AMERICANS, CONNECTICUT CITIZEN ACTION GROUP, AND BETTE
MARAFINO'S MOTION TO INTERVENE AS DEFENDANTS**

SEIU District 1199NE, the Connecticut Alliance for Retired Americans, Connecticut Citizen Action Group, and Bette Marafino (collectively, "Proposed Intervenor(s)") move to intervene as Defendants in this case under Federal Rule of Civil Procedure 24(a)(2) or, in the alternative, 24(b).

Proposed Intervenor(s) are registered Connecticut voters and membership-based organizations with members located in the state. They move to intervene to prevent their and their members' sensitive personal information on Connecticut's statewide voter list from being handed over to the federal government—the relief that Plaintiff seeks in this action. Proposed Intervenor(s) readily satisfy the standard for intervention as of right under Rule 24(a)(2): this motion is timely; they have a clear interest in ensuring the continued privacy of their and (in the case of the

organizational Proposed Intervenors) their members' personal information and infringement of that interest injures not only their members but the organizations themselves, by making it more difficult for them to advance mission-critical work; those interests are directly threatened and could be severely impaired by this suit; and they are not adequately represented by the existing parties in this matter.

Alternatively, Proposed Intervenors should be granted permissive intervention under Rule 24(b) to ensure that Connecticut voters have a voice in this case, the core subject of which is the disclosure of *their* personal information. At a minimum, Proposed Intervenors will help to develop the issues in this case. And Proposed Intervenors will abide by any schedule ordered by the Court or agreed to by the existing parties—they will not delay this action.

Federal courts in other states have repeatedly granted comparable motions to intervene in similar actions brought by the Department of Justice against those states, and the Court should do the same here.¹

For the reasons set forth in the accompanying memorandum, Proposed Intervenors respectfully request that the Court grant them intervention as of right—

¹ See Minute Order, *United States v. Amore*, No. 25-cv-00639-MSM-PAS (D. R. I. Jan. 6, 2026); Order, *United States v. Oregon*, No. 6:25-cv-01666, 2025 WL 3496571 (D. Or. Dec. 5, 2025); Order, *United States v. Benson*, No. 1:25-cv-01148 (W.D. Mich. Dec. 9, 2025), ECF No. 45; Minute Order, *United States v. Weber*, No. 2:25-cv-09149 (C.D. Cal. Nov. 19, 2025), ECF No. 70; Minute Order, *United States v. Nago*, No. 1:25-cv-000522 (D. Haw. Jan. 5, 2026), ECF No. 20; Order, *United States v. Scanlan*, No. 25-cv-371 (D. N.H. Jan. 5, 2026), ECF No. 23; Order, *United States v. Simon*, No. 0:25-cv-03761-KMM-EMB (D. Minn. Jan. 6, 2026), ECF No. 90; Electronic Order, *United States v. Galvin*, No. 1:25-cv-13816-LTS (D. Mass. Jan. 6, 2026), ECF No. 30.

or in the alternative grant permissive intervention—to allow them to protect the significant interests they have at stake in this case.²

Dated: January 9, 2026

Respectfully submitted,

/s/ William Bloss

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* *Pro Hac Vice* Applications Forthcoming

Counsel for Proposed Intervenors

ORAL ARGUMENT NOT REQUESTED

² Proposed Intervenors attach a proposed answer to this Motion in compliance with Rule 24(c) and 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.

CERTIFICATE OF SERVICE

I hereby certify that on January 9, 2026, a true and correct copy of the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ William Bloss

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