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*Counsel for Intervenor-Defendants
Make the Road New Jersey, Jamie Y. Ding,
and Danielle Litwak*

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,

Plaintiff,

v.

DALE G. CALDWELL, in his official
capacity as LIEUTENANT
GOVERNOR and SECRETARY OF
STATE of NEW JERSEY,

Defendant,

MAKE THE ROAD NEW JERSEY,
JAMIE Y. DING, and DANIELLE
LITWAK,

Intervenor-Defendants,

LEAGUE OF WOMEN VOTERS OF
NEW JERSEY, et al.,

Intervenor-Defendants,

NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED
PEOPLE, et al.,

Intervenor-Defendants.

Case No. 3:26-cv-2025-ZNQ-JTQ

**NOTICE OF MOTION TO DISMISS OF INTERVENOR-DEFENDANTS
MAKE THE ROAD NEW JERSEY, JAMIE Y. DING,
AND DANIELLE LITWAK**

To the Clerk of Court and all parties and counsel of record (each of which has been served with this and the accompanying papers):

PLEASE TAKE NOTICE that Intervenor-Defendants Make the Road New Jersey, Jamie Y. Ding, and Danielle Litwak (together, “MRNJ Intervenors”), through undersigned counsel, hereby move before this Court, on a date and time to be designated by it, for an order dismissing the Complaint with prejudice for failure to state a claim upon which relief may be granted, pursuant to Federal Rule of Civil Procedure 12(b)(6), Local Civil Rule 7.1, and this Court’s April 23, 2026 Scheduling Order (Dkt. No. 47).

PLEASE TAKE FURTHER NOTICE that in support of this motion, MRNJ Intervenors incorporate by reference all arguments made by Defendant Caldwell in his Motion to Dismiss filed May 4, 2026, *see* Dkt. No. 50-1, and rely on their own supporting brief filed herewith. Consistent with this Court’s April 23, 2026 Scheduling Order, MRNJ Intervenors’ supporting brief focuses on arguments that add to or supplement Defendant’s legal arguments, and it is limited to 10 double-spaced pages. *See* Dkt. No. 47. A proposed order is also submitted herewith.

WHEREFORE, MRNJ Intervenors respectfully request that the Court grant this motion and dismiss with prejudice the Complaint in the above-captioned matter.

Dated: May 11, 2026

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Respectfully submitted,
s/ Omeed Alerasool

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

s/ Omeed Alerasool
Omeed Alerasool

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