



250 Massachusetts Ave NW, Suite 400 | Washington, DC 20001

March 30, 2026

VIA IN-PERSON DELIVERY

The Honorable Edward F. Jewett, Clerk
Circuit Court of the City of Richmond
John Marshall Courts Building
400 North 9th Street
Richmond, VA 23219

copy

RECEIVED AND FILED CIRCUIT COURT <i>1:30</i> MAR 30 2026 EDWARD F. JEWETT, CLERK BY: <i>[Signature]</i> D.C.

Re: *Republican National Committee et al. v. Virginia State Board of Elections et al.*
Case No.: CL26001208-00

Dear Mr. Jewett:

Please find enclosed for filing Proposed Intervenor DCCC's Motion to Intervene in the above-referenced matter.

Thank you for your assistance in this matter. Please contact me if you have any questions.

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Very truly yours,



/s/ Aria C. Branch

Aria C. Branch (Va. No. 83682)

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CC: Katherine L. McKnight, Esq., Trevor M. Stanley, Esq., Richard B. Raile, Esq., William H. Hurd, Esq., Michael W. Thomas, Esq., Lee E. Goodman, Esq., Domenic P. Aulisi, Esq., Tillman J. Breckenridge, Esq.

Enclosure(s)

RETRIEVED FROM DEMOCRACY DOCKET.COM

VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF RICHMOND

REPUBLICAN NATIONAL COMMITTEE, *et al.*,

Plaintiffs,

v.

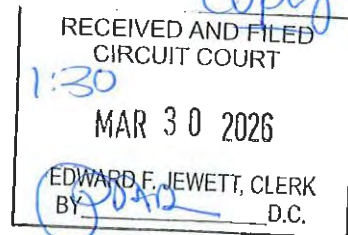
VIRGINIA STATE BOARD OF ELECTIONS, *et al.*,

Defendants.

Civil Action No. CL 26001208-00

Hon. Claire G. Cardwell

NOTICE OF APPEARANCE



PLEASE TAKE NOTICE that the undersigned counsel, Aria C. Branch of Elias Law Group LLP, Massachusetts Avenue NW, Suite 400, hereby enters her appearance on behalf of Proposed Intervenor DCCC.

DATED: March 30, 2026

Respectfully submitted,



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Counsel for Proposed Intervenor DCCC

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of March 2026, a true and exact copy of the foregoing was filed with the Office of the Clerk of the Circuit Court of the City of Richmond and, on the same date, sent by email to:

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DATED: March 30, 2026

Respectfully submitted,



Aria C. Branch (VSB No. 83682)

VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF RICHMOND

REPUBLICAN NATIONAL COMMITTEE, *et al.*,

Plaintiffs,

v.

VIRGINIA STATE BOARD OF ELECTIONS, *et al.*,

Defendants.

Civil Action No. CL 26001208-00

Hon. Claire G. Cardwell

**PROPOSED INTERVENOR-DEFENDANT DCCC'S
UNOPPOSED MOTION TO INTERVENE AS A DEFENDANT**

RETRIEVED FROM DEMOCRACYDOCKET.COM

Proposed Intervenor DCCC (d/b/a the Democratic Congressional Campaign Committee), by and through undersigned counsel, hereby moves to intervene in the instant matter under Va. Sup. Ct. R. 3:14. In this action, 23 Republican-affiliated organizations and individuals seek to prevent the Commonwealth from preparing to implement a new congressional districting map that they believe will advantage Democratic congressional candidates. As the committee directly tasked with advancing the electoral prospects of Democratic congressional candidates, DCCC has an acute interest in the outcome of this case and intends to offer a vigorous defense against Plaintiffs' claims.

Proposed Intervenor conferred with the Parties regarding their positions on this Motion. Defendants stated that they do not oppose this Motion; Plaintiffs stated that they have no objection to DCCC intervening so long as DCCC's involvement does not delay any hearing on Plaintiffs' motion for preliminary injunction.

BACKGROUND

The President's party typically loses congressional seats in midterm elections, and in light of the Republicans' razor-slim majority in the U.S. House of Representatives—combined with a series of unpopular policy initiatives—there is a non-trivial probability that Republicans will not retain control of that chamber after the 2026 midterm elections. Rather than seek to regain favor with voters, however, Republicans have sought to redraw congressional maps in Republican-controlled states in a manner designed to artificially inflate their power in Congress. Already, Republicans have engaged in unprecedented mid-decade redistricting in Texas, Missouri, and North Carolina, with further potential efforts underway in Florida, among other states.

That power grab threatens to disenfranchise Virginians, who tend to prefer Democratic candidates, because it would deny them a fair opportunity to elect and be governed by a

Democratic majority in the House. To partially offset the harm inflicted by mid-decade gerrymanders in other states, the General Assembly has passed a proposed amendment that would allow Virginians to amend the Constitution of Virginia to permit the General Assembly to restore fairness by adopting its own mid-decade redraw. Voters can ratify that proposed amendment in a special election scheduled for April 21, 2026. To prepare for that opportunity, the General Assembly enacted HB 29, which identifies the new congressional map that will be used if the constitutional amendment is adopted. H.D. Bill 29, § 16, Reg. Sess. (Va. 2026) (enacted Feb. 20, 2026).

Several lawsuits followed the passage of the proposed constitutional amendment. Most challenge the process by which the General Assembly passed the proposed constitutional amendment or the process by which the proposed amendment will be put to the voters in the upcoming referendum. The Supreme Court of Virginia, however, recently confirmed that courts will not have jurisdiction to hear these challenges unless and until the proposed amendment is ratified by the voters. *See Koski v. Republican Nat'l Comm.*, No. 260169, 2026 WL 608588, at *4 (Va. Sup. Ct. Mar. 4, 2026) (citing *Scott v. James*, 114 Va. 297 (1912)).

The Republican Party, however, refuses to accept any diminishment of the artificial advantage it has accrued in other states. On March 3, 2026, Plaintiffs the Republican National Committee, Republican Party of Virginia, five Republican members of the U.S. House of Representatives representing congressional districts in Virginia, and 16 other local Republican officials (collectively, "RNC") filed this action seeking to block the implementation of HB 29. Specifically, RNC seeks declaratory and injunctive relief against the repeal of the prior congressional map and the implementation of the new map. *Id.* at 45.

Proposed Intervenor DCCC is the Democratic Party's national congressional committee. Its mission is to elect candidates of the Democratic Party from across the country to the U.S. House of Representatives, including in Virginia's 11 congressional districts. DCCC pursues its mission by working with Democratic congressional campaigns to amplify the message of the Democratic Party, by encouraging and assisting supporters of the Democratic Party in successfully casting ballots, and by fighting for the legal voting rights of its voters. In line with these initiatives, DCCC advocates for fair congressional maps that ensure the Democratic Party is not arbitrarily disadvantaged by Republican gerrymanders in other states.

ARGUMENT

DCCC has unique and weighty interests in this matter that warrant intervention under Supreme Court of Virginia Rule 3:14. A proposed intervenor may move to "assert any claim or defense germane to the subject matter of the proceeding," Va. Sup. Ct. R. 3:14, so long as it is also "asserting an interest that is part of the subject matter of the litigation," *Hudson v. Jarrett*, 269 Va. 24, 32 (2005); *see also Eads v. Clark*, 272 Va. 192, 196 (2006) ("[T]o become a party by intervention [a proposed intervenor] must 'assert some right involved in the suit.'" (quoting William M. Lile, *Lile's Equity Pleading & Practice* 91 (3d ed. 1952))).

DCCC plainly satisfies these requirements. DCCC is an organization dedicated to advancing the electoral prospects of Democratic Party congressional candidates. Plaintiffs take direct aim at those interests. They allege, for example, that the General Assembly's proposed map would create a "10-1 partisan split" favoring Democrats. Compl. ¶ 3. DCCC naturally has an interest in defending the validity of a congressional map that aids the electoral prospects of Democrats by countering the partisan skew threatened by Republican redistricting efforts throughout the country.

Courts throughout the country have recognized DCCC's strong interests in similar contexts (including in parallel redistricting cases in other states) and have allowed DCCC to intervene to vindicate those interests. *See* Order Granting DCCC's Mot. to Intervene, *Tangipa v. Newsom*, No. 2:25-10616 (C.D. Cal. Nov. 12, 2025), ECF No. 26 (granting DCCC's motion to intervene in litigation involving California's congressional redistricting); *Issa v. Newsom*, No. 22-CV-1044, 2020 WL 3074351, at *2–3 (E.D. Cal. June 10, 2020) (granting DCCC's motion to intervene in litigation involving voting rules, in part because of the DCCC's interest in "advancing [the Democrats'] overall electoral prospects"); *Paher v. Cegavske*, No. 3:20-cv-0243, 2020 WL 2042365, at *2 (D. Nev. Apr. 28, 2020) (granting DCCC's motion to intervene in litigation involving election rules because of DCCC's interest in "ensur[ing] the election of Democratic Party candidates").

Here, all of the Plaintiffs are Republican organizations or officials who represent interests directly contrary to DCCC's interests. The Complaint alleges that the RNC, for example, has an interest in this litigation because it "seeks to facilitate the election of Republican nominees to federal offices" and "engages in advocacy and organizational efforts in support of Republican candidates for congressional seats, including in Virginia." Compl. ¶ 170. Simply swap "Republican" with "Democratic," and Plaintiffs' allegations about their own competitive and partisan interests in this action apply with equal force to DCCC.

The U.S. Supreme Court recently recognized that electoral participants have an interest in election rules and procedures that is strong enough even to satisfy Article III's much higher bar for standing. *See Bost v. Ill. Bd. of Elections*, 607 U.S. ___, 146 S. Ct. 513, 519–20 (2026). Like the congressional candidate in *Bost*, DCCC is no "mere bystander" and asserts a powerful "interest in a fair process" for electing Democratic congressional candidates in Virginia. *Id.* And as required

by Virginia's intervention law, DCCC aims to vindicate that interest with an indisputably germane defense of HB 29. As it will show if intervention is granted, the map identified by HB 29 fully complies with all legal requirements, and election officials need not be caught completely flatfooted without a map if the proposed constitutional amendment is adopted in a few weeks.

Unlike the federal rules for intervention as of right, Virginia law does not require a proposed intervenor to demonstrate that its interests will be unrepresented by other parties. *Compare* Fed. R. Civ. P. 24(a), *with* Va. Sup. Ct. R. 3:14. Even if there were such a requirement, however, DCCC's interests are significantly distinct from those of the existing Defendants, who are public officials and election administrators sued in their official capacities. DCCC's mission is to ensure the election of Democrats to Congress, which differs fundamentally from Defendants' administrative duties as election officials. DCCC—not Defendants—is tasked with ensuring that Republican gerrymandering efforts are countered effectively nationwide. And while Defendants, as governmental entities and officials, must "bear in mind broader public-policy implications," private litigants like DCCC seek to vindicate their own interests "full stop." *Berger v. N.C. State Conf. of the NAACP*, 597 U.S. 179, 196 (2022) (reversing denial of intervention).

Finally, practical considerations also weigh heavily in favor of intervention. DCCC's entry into the case would not delay these proceedings. DCCC seeks to intervene only days after Defendants have been served and before any significant discovery or motion practice has occurred. DCCC agrees to abide by any schedule set by the Court. Further, DCCC has significant experience and expertise in redistricting litigation, as demonstrated by its participation in parallel challenges to mid-decade redistricting throughout the country. That experience will bring unique insights to this litigation that will assist the Court in its adjudication of the relevant issues. Regardless of outcome, this case benefits from DCCC's presence.

CONCLUSION

For the reasons set forth herein, DCCC respectfully requests that the Court grant its Unopposed Motion to Intervene.

DATED: March 30, 2026

Respectfully submitted,



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Counsel for Proposed Intervenor DCCC

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