

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

LEAGUE OF WOMEN VOTERS OF
MASSACHUSETTS, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, *et al.*,

Defendants.

Case No. 1:26-cv-11549-IT

**MEMORANDUM IN OPPOSITION TO PROPOSED INTERVENOR-
DEFENDANTS' MOTION TO INTERVENE**

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INTRODUCTION

Plaintiffs respectfully ask this Court to deny the motion to intervene filed by Proposed Intervenor-Defendants,¹ *see* Dkt. No. 44, because those states seek to intervene only for the purpose of seeking transfer of the case to another court, *see* Mem. in Support of Intervener States' Mot. to Transfer, Dkt. No. 47. This would unfairly prejudice Plaintiffs as set out below.

ARGUMENT

As reflected in Proposed Intervenor-Defendants' Certificate of Conferral, League of Women Voters of Massachusetts (LWVMA) Plaintiffs took the following position on the motion to transfer: "LWVM Plaintiffs oppose the motion to transfer. With respect to the motion to intervene, LWVM Plaintiffs take no position if the proposed intervenors do not move to transfer. If the proposed intervenors move to transfer, LWVM Plaintiffs oppose the motion to intervene because the proposed intervenors are seeking to transfer." Dkt. No. 44 at 6.

Almost immediately upon moving to intervene, Proposed Intervenor-Defendants moved to transfer this case to the U.S. District Court for the District of Columbia, *see* Dkt. No. 46, on substantially the same grounds as Defendants, *compare* Mem. in Support of Intervener States' Mot. to Transfer, Dkt. No. 47, *with* Defs' Mem. of Law in Support of Defs' Mot. to Transfer, Dkt. No. 20. As Plaintiffs make clear in their opposition to the motion to transfer, which has been filed today, such a transfer is both unwarranted and extremely prejudicial. *See* Dkt. No. 85. Plaintiffs have already filed a motion for a preliminary injunction in this case, have a set briefing schedule and hearing date on that motion, and face irreparable injury from any delay in the adjudication of that motion. *See id.* at 3–5, 15–17; *see also* Order, Dkt. No. 57. Given that "prejudice to the existing

¹ Proposed Intervenor-Defendants are the States of Alabama, Florida, Indiana, Kansas, Louisiana, Missouri, Montana, Nebraska, Oklahoma, South Carolina, South Dakota, and Texas.

parties” is a key factor under the standard for intervention as of right, *R & G Mortg. Corp. v. Fed. Home Loan Mortg. Corp.*, 584 F.3d 1, 7 (1st Cir. 2009), and the standard for permissive intervention, *see T-Mobile Ne. LLC v. Town of Barnstable*, 969 F.3d 33, 44 (1st Cir. 2020) (“[A] district court ‘must consider whether the intervention will unduly delay or prejudice the adjudication of the original parties’ rights.”) (quoting Fed. R. Civ. P. 24(b)(3)), Proposed Intervenor-Defendants’ motion to intervene should be denied.

CONCLUSION

For the foregoing reasons, this Court should deny Proposed Intervenor-Defendants’ motion to intervene.

Dated: April 27, 2026

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CERTIFICATE OF SERVICE

I hereby certify that on April 27, 2026, a true copy of the above document was filed via the Court's CM/ECF system and that a copy will be sent automatically to all counsel of record.

April 27, 2026

/s/ Sophia Lin Lakin
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