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Attorneys for Proposed Intervenors
** Pro hac vice application forthcoming*

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

THE UNITED STATES OF AMERICA,

Plaintiff,

v.

PHILIP MCGRANE, in his official
capacity as Idaho Secretary of State,

Defendant.

Case No.: 1:26-cv-00197-BLW

**NAACP, NAACP TRI-STATE
CONFERENCE, AND IDAHO
ALLIANCE FOR RETIRED
AMERICANS' MOTION TO
INTERVENE AS DEFENDANTS**

Pursuant to Federal Rules of Civil Procedure 24(a) and (b), the National Association for the Advancement of Colored People, National Association for the Advancement of Colored People Tri-State Conference of Idaho, Nevada and Utah, and the Idaho Alliance for Retired Americans respectfully motion for the Court to grant intervention as of right, or in the alternative, permissive intervention. Proposed Intervenors move to intervene to defend against the federal government's suit and to preserve the privacy rights of their members and constituents in Idaho. The Court should grant the motion for the reasons given in the accompanying memorandum in support.

Dated: April 6, 2026

Respectfully submitted,

/s/ Terri R. Pickens

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 6, 2026, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent a Notice of Electronic Filing to all counsel of record.

/s/ Terri R. Pickens

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