UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

Donald J. Trump for President, Inc., Lawrence Roberts, and David John Henry,

Plaintiffs,

v.

Kathy Boockvar, in her capacity as Secretary of the Commonwealth of Pennsylvania, Allegheny County Board of Elections, Centre County Board of Elections, Chester County Board of Elections, Delaware County Board of Elections, Montgomery County Board of Elections, Northampton County Board of Elections, and Philadelphia County Board of Elections,

Defendants,

v.

DNC Services Corporation/Democratic National Committee,

Proposed Intervenor-Defendant.

No. 4:20-cv-02078-MWB (Judge Matthew Brann)

PROPOSED INTERVENOR-DEFENDANT'S MOTION TO INTERVENE

Proposed Intervenor-Defendant DNC Services Corporation/Democratic National Committee moves for leave to participate in this action to defend its interests against the claims asserted by Plaintiffs. For the reasons discussed in the memorandum in support, Proposed Intervenor is entitled to intervene in this case as a matter of right under Federal Rule of Civil Procedure 24(a)(2). In the alternative,

Proposed Intervenor requests permissive intervention pursuant to Rule 24(b).¹

WHEREFORE, Proposed Intervenor requests that the Court grant it leave to intervene in the above-captioned matter.

¹ Proposed Intervenor further seeks leave to file its proposed motion to dismiss in accordance with the Court's Scheduling Order issued on November 10, 2020. ECF No. 35; *see* Fed. R. Civ. P. 24(c).

Dated: November 11, 2020

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Respectfully submitted,

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*Motions for Special Admission Forthcoming

CERTIFICATE OF SERVICE

I hereby certify that on November 11, 2020, I filed a copy of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Clifford B. Levine
Counsel for Proposed Intervenor

CERTIFICATE OF CONFERRAL

I hereby certify that on November 10, 2020, I conferred with counsel for Defendants counsel as to their position on this motion. Defendants' counsel does not oppose this motion. On November 11, I attempted to confer with counsel for Plaintiffs but was unable to obtain their position on this motion.

/s/ Clifford B. Levine
Counsel for Proposed Intervenor