

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA**

Jim Bognet, *et al.*,

Plaintiffs,

v.

Kathy Boockvar, in her capacity as Secretary
of the Commonwealth of Pennsylvania, *et al.*,

Defendants.

No. 3:20-CV-215

PROPOSED INTERVENOR-DEFENDANT'S MOTION TO INTERVENE

Proposed Intervenor-Defendant, the 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). In accordance with Rule 24(c), a proposed answer to Plaintiffs' complaint is attached as Exhibit A.

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

Dated: October 24, 2020.

Respectfully submitted,

/s/ Justin T. Romano

Justin T. Romano
PA ID No. 307879
justin@arlawpitt.com
Marco S. Attisano
PA ID No. 316736
marco@arlawpitt.com
429 Fourth Avenue, Suite 1705
Pittsburgh, PA 15219
Phone: (412) 336-8622
Fax: (412) 336-8629

Adam C. Bonin,
PA ID No. 80929 (WD PA admission pending)
The Law Office of Adam C. Bonin
121 S. Broad St., Suite 400
Philadelphia, PA 19107
Phone: (267) 242-5014
Facsimile: (215) 827-5300
adam@boninlaw.com

Marc E. Elias*
Uzoma Nkwonta*
Stephanie Command*
Courtney Elgart*
Jacob D. Shelly*
PERKINS COIE LLP
700 Thirteenth St., N.W., Suite 600
Washington, D.C. 20005-3960
Telephone: (202) 654-6200
Facsimile: (202) 654-9959
melias@perkinscoie.com
unkwonta@perkinscoie.com
scommand@perkinscoie.com
celgart@perkinscoie.com
jshelly@perkinscoie.com

Counsel for Proposed Intervenors

**Motions for Admission Pro Hac Vice
Forthcoming*

CERTIFICATE OF SERVICE

I hereby certify that on Saturday, October 24, 2020, on 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/ Justin T. Romano
Counsel for Proposed Intervenor