IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF WISCONSIN

DONALD J. TRUMP, Candidate for President of the United States of America,

No. 2:20-cv-01785

Plaintiffs

v.

THE WISCONSIN ELECTIONS COMMISSION, et al.,

Defendants.

PROPOSED INTERVENOR-DEFENDANT THE DEMOCRATIC NATIONAL COMMITTEE'S MOTION TO INTERVENE

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

In accordance with Rule 24(c), the DNC intends to file a proposed answer to Plaintiff's complaint. That complaint, however, is 72 pages and 302 paragraphs long, and the DNC needs additional time to prepare a proposed answer. Because of the expedited character of these proceedings, counsel are submitting the DNC's motion to intervene and a proposed order at this time, and will file a proposed answer later on Friday, December 4, 2020.

WHEREFORE, and subject to the submission of its proposed answer on December 4, the DNC respectfully requests that the court grant it leave to intervene in the above-captioned matter.

DATED: December 4, 2020

Respectfully Submitted,

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Counsel for Proposed Intervenor-Defendant

[/]s/ Michelle M. Umberger

CERTIFICATE OF SERVICE

I hereby certify that on Friday, December 4, 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.

<u>/s/Michelle M. Umberger</u> Counsel for Proposed Intervenor