

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
No. 3:21-cv-00493

JERRY GREEN and LINDA PETROU,

Plaintiffs,

v.

KAREN BRINSON BELL, in her official
capacity as Executive Director of the North
Carolina Board of Elections,

Defendant, and

THE LEAGUE OF WOMEN VOTERS OF
NORTH CAROLINA AND THE NORTH
CAROLINA A. PHILIP RANDOLPH
INSTITUTE,

Proposed Defendant-Intervenors.

**THE LEAGUE OF WOMEN VOTERS OF NORTH CAROLINA AND THE NORTH
CAROLINA A. PHILIP RANDOLPH'S MOTION TO INTERVENE AS DEFENDANTS**

Pursuant to Federal Rule of Civil Procedure 24, the League of Women Voters of North Carolina and the North Carolina A. Philip Randolph Institute (“Defendant-Intervenors”) respectfully submit this motion, by and through undersigned counsel, to intervene as Defendants in the above-captioned case as of right or, in the alternative, with the Court’s permission.

As set forth in the accompanying memorandum in support of the motion to intervene, Defendant-Intervenors oppose any requested court-ordered purging of voting rolls in North Carolina, including the 40 North Carolina counties referenced in the Complaint, and will seek a judgment on the pleadings in favor of Defendants. As required by Federal Rule of Civil Procedure 24(c), a proposed Answer setting forth this defense is attached hereto as Exhibit 1. No such court-

ordered “list maintenance” is appropriate under – much less required by – the National Voter Registration Act of 1993 (“NVRA”), a federal statute designed to make it easier for citizens to become and remain registered to vote.

In further support of this Motion, Defendant-Intervenors file the Declaration of Jo Nicholas, sworn to November 12, 2021 (attached hereto as Exhibit 2) and the Declaration of Melvin Montford, sworn to November 12, 2021 (attached hereto as Exhibit 3).

Proposed Defendant-Intervenors inquired of counsel for Plaintiff and Defendant on November 11, 2021 concerning their position regarding this Motion. Counsel for Plaintiff indicated that it would provide its position upon review of the grounds for intervention articulated in the motion. Counsel for Defendant has not yet responded to the inquiry.

This the 12th day of November, 2021.

Respectfully submitted,

/s/ Pressly M. Millen
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