UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

GEORGIA STATE CONFERENCE OF THE NAACP; GEORGIA COALITION FOR THE PEOPLE'S AGENDA, INC.; and NEW GEORGIA PROJECT, INC., *Plaintiffs*, v. BRIAN KEMP, Governor of the State of Georgia, in his official capacity, and BRAD RAFFENSPERGER, Secretary of State of Georgia, in his official capacity, *Defendants*, REPUBLICAN NATIONAL COMMITTEE and GEORGIA REPUBLICAN PARTY, INC. *Proposed Intervenor-Defendants*.	Case No: 1:24-cv-04546-ELR

MOTION TO INTERVENE

The Republican National Committee (RNC) and Georgia Republican Party, Inc. (GAGOP) move to intervene as Defendants in this case under Federal Rule of Civil Procedure 24. Given the hearing on the Plaintiffs' TRO motion scheduled for tomorrow, Movants file this abbreviated motion to preserve their interests in this case. They are prepared to present argument at the hearing on Plaintiffs' motion. The Court can grant intervention for the reasons stated below, but otherwise Movants intend to file a brief in support of intervention and a responsive pleading as required by Rule 24.

For purposes of this limited motion, it suffices that when the Georgia NAACP has challenged Georgia's election laws in this Court, the RNC and GAGOP have successfully intervened. *Ga. State Conf. of NAACP v. Raffensperger*, Doc. 40, No. 1:21-cv-1259 (N.D. Ga. June 4, 2021). In fact, in recent challenges to Georgia's election laws, this Court has always allowed political committees—including Movants—to intervene to protect their interests in the laws and rules governing Georgia's elections.[1] Movants are unaware of any ruling in the Northern District of Georgia denying any national political committee intervention in a case challenging Georgia's election laws. For these reasons, Movants respectfully request that the Court grant the motion to intervene. At a minimum, Movants ask that the Court allow them to participate in the TRO hearing tomorrow. Given the complicated issues and quick timeline, Movants' experience in election litigation will aid the Court in reaching a reasoned decision on the motion. Movants reached out to the parties for their position on the motion, but have not heard back as of the time of filing.

[1] *E.g.*, *Int'l All. of Theater Stage Emps. Local 927 v. Lindsey*, Doc. 84, No. 1:23-cv-4929 (N.D. Ga. May 3, 2024) (granting intervention to the RNC and GAGOP); *United States v. Georgia*, Minute Order, No. 1:21-cv-2575 (N.D. Ga. July 12, 2021) (granting intervention to the RNC, NRSC, NRCC, and GAGOP); *Coal. for Good Governance v. Raffensperger*, Minute Order, No. 1:21-cv-2070 (N.D. Ga. June 21, 2021); *Concerned Black Clergy of Metro. Atlanta v. Raffensperger*, Minute Order, No. 1:21-cv-1728 (N.D. Ga. June 21, 2021); *Sixth Dist. of the African Methodist Episcopal Church v. Kemp*, Minute Order, No. 1:21-cv-1284 (N.D. Ga. June 4, 2021); *Vote Am. v. Raffensperger*, Doc. 50, No. 1:21-cv-1390 (N.D. Ga. June 4, 2021); *Asian Ams. Advancing Justice-Atlanta v. Kemp*, Doc. 39, No. 1:21-cv-1284 (N.D. Ga. June 4, 2021); *Wood v. Raffensperger*, Doc. 14, No. 1:20-cv-5155 (N.D. Ga. Dec. 28, 2020) (order granting intervention to the Democratic Party of Georgia and the DSCC); *Black Voters Matter Fund v. Raffensperger*, Doc. 42, No. 1:20-cv-4869 (N.D. Ga. Dec. 9, 2020).

Dated: October 8, 2024

Respectfully submitted,

/s/ William Bradley Carver, Sr.

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CERTIFICATE OF COMPLIANCE

This document complies with Local Rule 5.1(B) because it uses 13 point Century Schoolbook font.

/s/ William Bradley Carver Sr.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 8, 2024, the foregoing was electronically filed with the Clerk of Court by using the CM/ECF system, which will also send a notice of electronic filing to all counsel of record. Those parties who have not yet appeared will be served via email.

/s/ William Bradley Carver Sr.