

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION**

LEAGUE OF WOMEN VOTERS OF
VIRGINIA, *et al.*,

Plaintiffs,

v.

VIRGINIA STATE BOARD OF
ELECTIONS, *et al.*,

Defendants.

Case No.: 6:20-cv-00024-NKM

**MOTION TO INTERVENE OF THE
REPUBLICAN PARTY OF VIRGINIA,
VICKI BURNS, VINCE FALTER,
MILDRED H. SCOTT, AND THOMAS
TURNER**

NOW COMES the Republican Party of Virginia, Inc. (“**RPV**”), MG Vincent E. Falter, USA (ret), Mildred H. Scott, and Thomas N. Turner, Jr. (collectively, “**Applicants**”), by counsel, and respectfully move this Court to intervene in this case pursuant to Rules 24(a)(2) and 24(b) of the Federal Rules of Civil Procedure. This motion is accompanied by a Memorandum of Points and Authorities that explains why Applicants are entitled to intervene in this case of right and are also entitled to permissive intervention. Applicants respectfully request that the Court grant intervention.

Applicants’ counsel contacted counsel for the parties seeking their consent on this motion. Counsel for Plaintiffs and Defendants both indicated their opposition to Applicants’ intervention.

In conformance with Federal Rule of Civil Procedure 24(c), a proposed Answer is attached as Exhibit A to this motion, and a proposed order is attached as Exhibit B.

Dated: April 24, 2020

Respectfully submitted,

/s/ Christopher M. Marston
Christopher M. Marston (VSB No. 65703)
chris@2562group.com
2652 GROUP LLC
P.O. Box 26141
Alexandria, VA 22313-6141
571.482.6790 / Fax 703.997.2549

Trevor M. Stanley (VSB No. 77351)
E. Mark Braden (pro hac vice pending)
Katherine L. McKnight (adm. pending)
Richard Raile (VSB No. 84340)
BAKER & HOSTETLER LLP
Washington Square, Suite 1100
1050 Connecticut Avenue, N.W.
Washington, DC 20036-5403
202.861.1500 / Fax 202.861.1783
tstanley@bakerlaw.com
mbraden@bakerlaw.com
kmcknight@bakerlaw.com
rraile@bakerlaw.com

Patrick T. Lewis (pro hac vice pending)
BAKER & HOSTETLER LLP
127 Public Square, Suite 2000
Cleveland, OH 44114-1214
216.621.0200 / Fax 216.696.0740
plewis@bakerlaw.com

Counsel for Proposed Intervenors

CERTIFICATE OF SERVICE

I certify that on April 24, 2020, the foregoing was filed on the Court's electronic case filing system. Notice of the filing was generated by the Court's electronic system. Copies of the filing are available on that system.

/s/ Christopher M. Marston
Christopher M. Marston (VSB No. 65703)