

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF LOUISIANA**

Clark, *et al.*,

Plaintiffs,

v.

Edwards, *et al.*,

Defendants,

c/w

Civil Action: 20-cv-308-SDD-RLB

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Power Coalition for Equity and Justice, *et al.*,

Plaintiffs,

v.

John Bel Edwards, the Governor of the State  
of Louisiana, in his Official Capacity, *et al.*,

Defendants,

and

The State of Louisiana,

Proposed Intervenor.

Civil Action: 20-cv-283-SDD-RLB

**THE STATE OF LOUISIANAS' UNOPPOSED MOTION TO INTEREVENE.**

Pursuant to Federal Rule of Civil Procedure 24(a) and/or (b), the State of Louisiana, by and through Attorney General Jeff Landry, in his official capacity, respectfully moves the Court to permit the State of Louisiana to intervene in the above captioned suit. No party in *Power Coalition* opposes this motion.

1.

On May 7, 2020, Plaintiffs brought suit seeking declaratory and injunctive relief claiming that, as a result of COVID-19, Louisiana's election laws violate Plaintiffs' First and Fourteenth Amendment Rights as well as the Voting Rights Act. *Power Coalition for Equity and Justice*, No. 20-cv-283 (M.D. La.) (ECF No. 1).

2.

Shortly thereafter, on May 19, 2020, a separate set of Plaintiffs brought suit alleging nearly identical claims as were sought in *Power Coalition*. See *Clark v. Edwards*, No. 20-cv-308-SDD (M.D. La.) (filed May 19, 2020) (hereinafter "Clark Litigation"). The Attorney General is a named party in the Clark Litigation.

3.

On May 26, 2020, Defendant Registrars in *Power Coalition* filed an unopposed motion to consolidate the two cases. See *Power Coalition for Equity and Justice*, No. 20-cv-283 (M.D. La.) (ECF No. 15). That motion was granted on June 3, 2020. *Id.* at (ECF No. 28); *Clark v. Edwards*, No. 20-cv-308 (M.D. La.) (ECF No. 17). In light the now granted motion to consolidate, the Attorney General, on behalf of the State of Louisiana, seeks to intervene in *Power Coalition* so that, *inter alia*, its rights may be applied equally to the two consolidated cases.

4.

Pursuant to Rule 24(c), the following documents are attached: (1) State's Motion to Dismiss Plaintiffs' Complaint in *Power Coalition* (Exhibit A); and (2) the State's Answer to Plaintiffs' Complaint in *Power Coalition* (Exhibit B). The State would like to reserve its right to amend these documents pursuant to any subsequent scheduling order the Court may order in the newly consolidated cases or as justice would otherwise dictate.

5.

Intervention is necessary here as of right or permissively so that the State, through its constitutionally designated officer, may be heard in defense of its election laws and regulations.

Therefore, for the reasons detailed in the attached Memorandum of Law, the State respectfully requests that the Court grant its Rule 24 Motion to Intervene in *Power Coalition for Equity and Justice v. Edwards*, No. 20-cv-283-BAJ (M.D. La).

Dated: June 5, 2020

Respectfully Submitted,

JEFF LANDRY  
ATTORNEY GENERAL

/s/ Angelique Duhon Freel

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\*pro hac vice motions forthcoming

*Counsel for Applicant the State of Louisiana*

**CERTIFICATE OF SERVICE**

I do hereby certify that, on this 5th day of June 2020, the foregoing Motion to Intervene was electronically filed with the Clerk of Court using the CM/ECF system, which gives notice of filing to all counsel of record.

/s/ Angelique Duhon Freel  
Angelique Duhon Freel

*Counsel for Applicant the State of Louisiana*