

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

STATE OF SOUTH CAROLINA,)	
)	
Plaintiff,)	
)	
v.)	
)	
UNITED STATES OF AMERICA, et al.,)	No. 1:12-cv-00203-CKK-BMK-JDB
)	
Defendants,)	
)	
and)	
)	
JAMES DUBOSE, et al.,)	
)	
Defendant-Intervenors.)	

DEFENDANT-INTERVENORS’ MOTION TO ADD PARTIES

Pursuant to Rule 21 of the Federal Rules of Civil Procedure, Defendant-Intervenors James Dubose, *et al.*, respectfully move the Court to add Delores Freelon, Naomi Gordon, Joseph Riley, Raymond Rutherford, and the South Carolina Progressive Network as defendant-intervenors in this action. Freelon, Gordon, Riley, and Rutherford are residents and registered voters in South Carolina, none of whom currently possesses an acceptable form of photo identification as would be required under South Carolina’s voter photo identification law. These individuals want to vote in the November election but will have difficulty obtaining acceptable photo identification and will likely be unable to vote if the voter photo identification law is precleared and implemented. South Carolina Progressive Network (“SCPN”) is a coalition of grassroots activists seeking to promote social and economic justice in South Carolina. SCPN lobbied against the voter photo identification bill and sent comments to the Department of Justice during its consideration of the bill under Section 5 of the Voting Rights Act. SCPN has since been educating voters on the requirements of

the bill, and identifying those unable to meet the requirements. The addition of these four individuals and one organization to this case would not change the substance of the defendant-intervenors' defenses and would not require any change in the scheduling order.

Counsel for defendants and applicants for intervention have advised that they do not oppose this motion. Counsel for the State of South Carolina does not anticipate opposing this motion, but advised that they would reserve judgment until the motion is filed.

Respectfully submitted,

/s/ Arthur B. Spitzer

ARTHUR B. SPITZER (D.C. Bar. No. 235960)
American Civil Liberties Union of the Nation's Capital
4301 Connecticut Avenue, N.W., Suite 434
Washington, D.C. 20008
(202) 457-0800
(202) 457-0805 (fax)
artspitzer@gmail.com

LAUGHLIN McDONALD
NANCY ABUDU
KATIE O'CONNOR
American Civil Liberties Union Foundation, Inc.
230 Peachtree Street, N.W., Suite 1440
Atlanta, Georgia 30303-1227
(404) 523-2721
(404) 653-0331 (fax)
lmcdonald@aclu.org
nabudu@aclu.org
koconnor@aclu.org

SUSAN K. DUNN
American Civil Liberties Union of South Carolina
Post Office Box 20998
Charleston, South Carolina 29413
sdunn@aclusouthcarolina.org

Attorneys for Defendant-Intervenors

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