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League of Women Voters of California,  
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and Mi Familia Vota Education Fund*

*Attorneys for Intervenor-Defendants Sophie  
Kosmacher, Anadela Navarrete Gomez, and  
Kelly Lippman*

*[Additional counsel listed on signature page]*

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

ROXANNE HOGE, an individual; ALI  
MAZAREI, an individual; CORRIN  
RANKIN, an individual,

Plaintiffs,

v.

ALEX PADILLA, in his official  
capacity as the California Secretary of  
State; STEVE GORDON, in his official  
capacity as Director of California  
Department of Motor Vehicles,

Defendants,

LEAGUE OF WOMEN VOTERS OF  
CALIFORNIA; CALIFORNIA COMMON  
CAUSE; UNIDOSUS; MI FAMILIA VOTA  
EDUCATION FUND; SOPHIE  
KOSMACHER, an individual; ANADELA  
NAVARRETE GOMEZ, an individual; and  
KELLY LIPPMAN, an individual,

Intervenor-Defendants.

Case No. 2:19-cv-01985-MCE-AC

**PROPOSED INTERVENOR-  
DEFENDANTS' NOTICE OF MOTION  
AND MOTION TO INTERVENE AS  
DEFENDANTS**

Hearing Date: February 6, 2020  
Time: 2:00 p.m.  
Dept.: Courtroom 7, 14th floor  
Judge: Hon. Morrison C. England, Jr.

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on February 6, 2020, at 2:00 p.m. at the Robert T. Matsui United States Courthouse, 501 I Street, Sacramento, California, before the Honorable Morrison C. England, Jr. in Courtroom 7, 14th floor, proposed Intervenor-Defendants League of Women Voters of California, California Common Cause, UnidosUS, Mi Familia Vota Education Fund, Sophie Kosmacher, Anadela Navarrete Gomez, and Kelly Lippman will move and do hereby move the Court for an order granting intervention in this action and ordering the attached Intervenor-Defendants' [Proposed] Motion to Dismiss for Failure to State a Claim filed on the docket.

Proposed intervenors, pursuant to Federal Rule of Procedure 24, seek intervention as of right or, in the alternative, permissive intervention so that they may assert and defend their interests in, *inter alia*, protecting an active Settlement Agreement resulting from prior litigation, defending the privacy rights of their constituents, and vindicating their fundamental right to vote.

This motion is supported by this Notice of Motion and Motion; the attached Memorandum of Points and Authorities; Declarations of Anadela Navarrete Gomez, Helen Hutchison, Sophie Kosmacher, Kelly Lippman, Clarissa Martinez de Castro, and Samuel Molina; and such oral argument as may be presented by counsel.

Dated: December 16, 2019

Respectfully Submitted,

/s/ Sonja Diaz (as authorized on 12/16/19)  
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24 \*pro hac vice motion forthcoming

25 \*\* not admitted in DC; DC practice limited to federal court only

**CERTIFICATE OF SERVICE  
[FED. R. CIV. P. 5(b)]**

I hereby certify that on December 16, 2019, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

**INTERVENOR-DEFENDANTS' NOTICE OF MOTION AND MOTION TO INTERVENE**

**MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION TO INTERVENE**

**INTERVENOR-DEFENDANTS' [PROPOSED] MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM**

**INTERVENOR-DEFENDANTS' MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF [PROPOSED] MOTION TO DISMISS**

**[PROPOSED] ORDER GRANTING MOTION TO INTERVENE**

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the United States the foregoing is true and correct and that this declaration was executed on December 16, 2019, at Amherst, Massachusetts.

Dated: December 16, 2019

/s/ Stuart C. Naifeh

Stuart C. Naifeh