

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

JAMES V. LACY, in his capacity as President
of the United States Justice Foundation and
Policy Issues Institute,

UNITED STATES JUSTICE FOUNDATION,

POLICY ISSUES INSTITUTE,

and

ALEXANDER TOMESCU,

Plaintiffs,

v.

FEDERAL ELECTION COMMISSION,

Defendant,

and

NATIONAL PUBLIC RADIO, INC.,

Proposed Defendant-Intervenor.

Civil Action No. 1:25-cv-01808-RDM

**NATIONAL PUBLIC RADIO, INC.’S MOTION FOR INTERVENTION AS A
DEFENDANT**

For the reasons stated in the attached memorandum of law, National Public Radio, Inc. (“NPR”) respectfully requests that the Court permit its intervention as a matter of right in this action under Federal Rule of Civil Procedure 24(a) or, in the alternative, permit NPR permissive intervention under Rule 24(b). If granted permission to intervene, NPR has attached a proposed motion to dismiss for filing. Counsel for NPR have conferred with counsel for Plaintiffs who indicated that, at this time, Plaintiffs oppose this Motion. Counsel for NPR have also contacted

counsel for Defendant Federal Election Commission (“FEC”) who stated that the FEC takes no position on NPR’s motion to intervene given that the FEC lacks a quorum and is without the authority to litigate this matter.

Dated: August 26, 2025

Respectfully submitted,

/s/ Jason J. Mendo

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CERTIFICATE OF SERVICE

I hereby certify that on August 26, 2025 I electronically served a copy of the foregoing motion and related attachments on all counsel of record via the Court's CM/ECF system.

/s/ Jason J. Mendro
Jason J. Mendro