

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
CASE NO. 5:25-CV-283-M-RJ**

UNITED STATES OF AMERICA,

Plaintiff,

v.

NORTH CAROLINA STATE BOARD OF ELECTIONS; SAM HAYES, in his official capacity as Executive Director of the North Carolina State Board of Elections; FRANCIS X. DE LUCA, JEFF CARMON, STACY EGGERS IV, SIOBHAN O'DUFFY MILLEN, and ROBERT RUCHO, in their official capacities as Members of the North Carolina State Board of Elections; and STATE OF NORTH CAROLINA,

Defendants.

**THE DEMOCRATIC NATIONAL
COMMITTEE'S RENEWED
MOTION TO INTERVENE**

The Democratic National Committee ("DNC"), by and through counsel, renews its motion to intervene in this matter as Intervenor-Defendant, requesting that the Court allow it to intervene as of right pursuant to Federal Rule of Civil Procedure 24(a). In the alternative, the DNC renews its request the Court permit it to intervene pursuant to Federal Rule of Civil Procedure 24(b). In support of this motion, the DNC relies on the bases and authorities in its contemporaneously filed memorandum of law.

WHEREFORE, the DNC respectfully requests that the Court grant its motion, allow it to intervene in this matter, and grant such other and further relief as the Court deems just and proper. A proposed order is attached.

Respectfully submitted this 16th day of September, 2025.

SETH P. WAXMAN
DANIEL S. VOLCHOK
CHRISTOPHER E. BABBITT
WILMER CUTLER PICKERING HALE AND
DORR LLC
2100 Pennsylvania Avenue N.W.
Washington, D.C. 20037
Phone: (202) 663-6000
Fax: (202) 663-6363
seth.waxman@wilmerhale.com
daniel.volchok@wilmerhale.com
christopher.babbitt@wilmerhale.com

/s/ Shana F. Fulton
JIM W. PHILLIPS, JR.
N.C. BAR NO. 12516
SHANA L. FULTON
N.C. BAR NO. 27836
WILLIAM A. ROBERTSON
N.C. BAR NO. 53589
JAMES W. WHALEN
N.C. BAR NO. 58477
BROOKS, PIERCE, MCLENDON, HUMPHREY &
LEONARD, LLP
150 Fayetteville Street
1700 Wells Fargo Capitol Center
Raleigh, N.C. 27601
Phone: (919) 839-0300
Fax: (919) 839-0304
jphillips@brookspierce.com
sfulton@brookspierce.com
wrobertson@brookspierce.com
jwhalen@brookspierce.com