

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

SOLICITOR GENERAL BRIAN W.
WHITESIDE,

Plaintiff,

v.

No. 1:21-cv-3618-JPB

BRAD RAFFENSPERGER, et al.,
Defendants,

REPUBLICAN NATIONAL
COMMITTEE; NATIONAL REPUBLICAN
SENATORIAL COMMITTEE;
and GEORGIA REPUBLICAN
PARTY, INC.,

Proposed Intervenor-Defendants.

**MOTION TO INTERVENE AND
COMBINED MEMORANDUM OF LAW**

Movants—the Republican National Committee, National Republican Senatorial Committee, and Georgia Republican Party, Inc.—respectfully move to intervene as defendants under Rules 24(a) and 24(b). Defendants take no position. Movants twice asked Plaintiff for his position, but Plaintiff would only say that he will win this case on the merits.

This Court has allowed Movants to intervene in the eight other cases challenging SB 202. This case challenges SB 202’s ban on gift giving, one of the provisions challenged in several of the other cases, and it’s been flagged as

related to the other cases. Movants thus ask the Court to grant intervention here for the same reasons it granted intervention in the eight related cases. Among other reasons, “Proposed Intervenors’ defenses ... share a common question of law or fact with the complaints,” “Proposed Intervenors moved to intervene soon after the complaints were filed,” and “the significant interests at stake militate in favor of permitting Proposed Intervenors to join the litigation.” *E.g.*, *New Ga. Proj. v. Raffensperger*, No. 1:21-cv-1229-JPB, 2021 WL 2450647, at *2 (N.D. Ga. June 4).

Dated: September 17, 2021

Respectfully submitted,

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CERTIFICATE OF COMPLIANCE

I certify that this document complies with Local Rule 5.1(B) because it uses 13-point Century Schoolbook font.

/s/ William Bradley Carver

CERTIFICATE OF SERVICE

On September 17, 2021, I e-filed this document on ECF, which will serve everyone requiring service.

/s/ William Bradley Carver