

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION**

**THE STATE OF LOUISIANA, By and
through its Attorney General, Elizabeth B.
Murrill;
THE STATE OF KANSAS, By and through
its Attorney General, Kris W. Kobach;
THE STATE OF OHIO, By and through its
Attorney General, Dave Yost; and
THE STATE OF WEST VIRGINIA, By and
through its Attorney General, John B.
McCuskey**

Plaintiffs,

vs.

**UNITED STATES DEPARTMENT OF
COMMERCE; JEREMY PELTER, in his
official capacity as Acting Secretary of
Commerce;
BUREAU OF THE CENSUS, an agency
within the United States Department of
Commerce; and
ROBERT L. SANTOS, in his official
capacity as Director of the U.S. Census
Bureau**

Defendants.

Case No.: 6:25-cv-0076-DCJ-DJA

**Judge David C. Joseph
Magistrate Judge David J. Ayo**

**MOTION TO INTERVENE OF THE LEAGUE OF WOMEN VOTERS,
THE LEAGUE OF WOMEN VOTERS OF FLORIDA, AND
THE LEAGUE OF WOMEN VOTERS OF NEW YORK STATE**

The League of Women Voters of the United States (“LWV”)¹, the League of Women Voters of Florida (“LWVFL”), and the League of Women Voters of New York State (“LWVNYS”) (collectively, “the League”), by and through their undersigned counsel, respectfully move to intervene as Defendants in this matter as of right pursuant to Federal Rule of Civil Procedure (“Rule”) 24(a) or in, the alternative, move for permissive intervention pursuant to Rule 24(b). Pursuant to Rule 24(c), Proposed Intervenors’ Memorandum in Support of this Motion and Answer is attached hereto as Attachments 1 and 5, respectively.²

Complying with Local Rule 7.6, on April 8, 2025, counsel for LWV, LWVFL, and LWVNYS informed all parties of their proposed intervention and presented their proposed Answer to all parties who have an interest to oppose. Plaintiffs oppose the proposed intervention; proposed Defendant-Intervenors Hannah Victoria Morgan, et. al., and proposed Defendant-Intervenor County of Santa Clara do not oppose the proposed intervention; and as of the time of writing, Defendants have not stated their position.

Dated: April 10, 2025

Respectfully submitted by,

/s/ Avner M. Shapiro

Bradley E. Heard*

Avner M. Shapiro*

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¹ The League comprises two branches: the League of Women Voters of the United States (“LWVUS”) and the League of Women Voters Education Fund (“LWVEF”). LWVUS “encourages informed and active participation in government, works to increase understanding of major public policy issues, and influences public policy through education, and advocacy.” LWVUS is a 501(c)(4) social welfare organization. *See* LWV, Ways to Give, <https://perma.cc/U3VP-HETC>. LWVEF “works to register and provide voters with election information through its election resource VOTE411.org, candidate forums, and debates.”

² Proposed Intervenors recognize that this matter has been stayed indefinitely and are filing this motion in an abundance of caution to ensure that, if the case goes forward, their application for intervention is considered along with the other applicants.

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/s/ Rose Murray

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* Applications for admission *pro hac vice*
pending

Attorneys for Proposed Defendant-Intervenors the National League of Women Voters ("LWV"), the Florida League of Women Voters ("LWVFL"), and the New York League of Women Voters ("LWVNYS")