

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA**

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NORTH CAROLINA STATE CONFERENCE  
OF THE NAACP, CHAPEL HILL—  
CARRBORO NAACP, GREENSBORO  
NAACP, HIGH POINT NAACP, MOORE  
COUNTY NAACP, STOKES COUNTY  
BRANCH OF THE NAACP, WINSTON-  
SALEM—FORSYTH COUNTY NAACP,  
*Plaintiffs,*

v.

ROY ASBERRY COOPER III, in his official  
capacity as the Governor of North Carolina;  
ROBERT CORDLE, in his official capacity as  
Chair of the North Carolina State Board of  
Elections; STELLA ANDERSON, in her  
official capacity as Secretary of the North  
Carolina State Board of Elections; KENNETH  
RAYMOND, JEFFERSON CARMON III, and  
DAVID C. BLACK, in their official capacities  
as members of the North Carolina State Board  
of Elections,

*Defendants*

and

VOTER INTEGRITY PROJECT NC, INC.,

*Proposed Defendant-Intervenor.*

Case No. 1:18-CV-1034

**MOTION TO INTERVENE**

The Voter Integrity Project NC, Inc. (VIP-NC) by and through undersigned  
counsel, respectfully move this Court for leave to intervene as Defendant as a matter of  
right under Rule 24(a)(2) of the Federal Rules of Civil Procedure, or, in the alternative,

permissively under Rule 24(b)(1). Pursuant to Federal Rule of Civil Procedure 24, VIP-NC's proposed responsive filing is attached to this motion.

Counsel for VIP-NC contacted counsel for the parties to request consent to this motion. Counsel for the State Board Defendants stated that they object to this motion. Counsel for Plaintiffs stated that they oppose this motion and intend to file a response in opposition.

In support of this motion, VIP-NC submits the accompanying supporting memorandum of points and authorities.

Dated: March 26, 2020

Respectfully Submitted,

/s/ Kaylan L. Phillips  
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*Counsel for Proposed Defendant-Intervenor*

/s/ Timothy R. Haga  
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*Local Civil Rule 83.1 Counsel for Proposed Defendant-Intervenor*

## **CERTIFICATE OF SERVICE**

I certify that on March 26, 2020, I caused the foregoing to be filed with the United States District Court for the Middle District of North Carolina via the Court's CM/ECF system, which will serve all registered users.

/s/ Kaylan L. Phillips

Kaylan L. Phillips

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