

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

COMMON CAUSE INDIANA,

Plaintiff

v.

CONNIE LAWSON, in her official capacity as
Secretary of State of Indiana, J. BRADLEY
KING, in his official capacity as Co-Director of
the Indiana Election Division, and ANGELA M.
NUSSMEYER, in her official capacity as Co-
Director of the Indiana Election Division,

Defendants

Case Number 1:17-cv-3936

**MOTION TO INTERVENE AS DEFENDANT BY
THE PUBLIC INTEREST LEGAL FOUNDATION**

The Public Interest Legal Foundation (the “Foundation”), by and through undersigned counsel, respectfully moves this Court for leave to intervene as a 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, the Foundation’s proposed responsive filing is attached to this motion. Pursuant to Local Rule 7-1, a supporting brief is also attached.

Dated: November 9, 2017

/s/ Joseph A. Vanderhulst

Kaylan L. Phillips

Joseph A. Vanderhulst

Public Interest Legal Foundation

32 E. Washington Street, Ste. 1675

Indianapolis, IN 46204

Tel: (317) 203-5599

Fax: (888) 815-5641

kphillips@publicinterestlegal.org

jvanderhulst@publicinterestlegal.org

J. Christian Adams (*pro hac vice* application forthcoming)

Public Interest Legal Foundation

300 N. Washington Street, Ste. 405

Alexandria, VA 22314

(317) 203-5599

adams@publicinterestlegal.org

Counsel for Proposed Defendant-Intervenor Public Interest Legal Foundation

CERTIFICATE OF SERVICE

I certify that on November 9, 2017, I caused the foregoing to be filed with the United States District Court for the District of Indiana via the Court's CM/ECF system, which will serve all registered users. The following non-registered users were served via USPS:

Connie Lawson
Secretary of State of Indiana
200 W. Washington St., Room 201
Indianapolis, IN 46204

J. Bradley King
Co-Director of the Indiana Election Division
302 W. Washington St., Room E204
Indianapolis, IN 46204-2767

Angela Nussmeyer
Co-Director of the Indiana Election Division
302 W. Washington St., Room E204
Indianapolis, IN 46204-2767

/s/ Joseph A. Vanderhulst
Joseph A. Vanderhulst