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13 UNITED STATES DISTRICT COURT
14 EASTERN DISTRICT OF CALIFORNIA

16 REPUBLICAN NATIONAL
17 COMMITTEE; NATIONAL
18 REPUBLICAN CONGRESSIONAL
19 COMMITTEE; and CALIFORNIA
20 REPUBLICAN PARTY,

19 Plaintiffs,

20 v.

21 GAVIN NEWSOM, in his official capacity
22 as Governor of California; and ALEX
23 PADILLA, in his official capacity as
24 California Secretary of State,

24 Defendants,

25 DEMOCRATIC CONGRESSIONAL
26 CAMPAIGN COMMITTEE and
27 DEMOCRATIC PARTY OF
28 CALIFORNIA,

Intervenor-Defendants.

No. 2:20-cv-01055-MCE-CKD

**PLAINTIFFS' OPPOSITION TO THE
MOTIONS TO INTERVENE BY
THE LEAGUE OF UNITED LATIN
AMERICAN CITIZENS, CALIFORNIA
LEAGUE OF UNITED LATIN AMERICAN
CITIZENS, CALIFORNIA LEAGUE OF
CONSERVATION VOTERS, AND
CALIFORNIA LEAGUE OF
CONSERVATION VOTERS
EDUCATION FUND**

JUDGE: Hon. Morrison C. England, Jr.

1 As Plaintiffs recently stated, they “oppose the intervention of any additional defendants.”
2 Doc. 53 at 2. For the same reasons this Court should deny permissive intervention to the other
3 advocacy groups, *see* Doc. 53, this Court should deny permissive intervention to the League of
4 United Latin American Citizens, California League of United Latin American Citizens, California
5 League of Conservation Voters, and California League of Conservation Voters Education Fund.
6 These groups should file amicus briefs instead.

7 While most of these advocacy groups (wisely) do not ask for intervention as of right, the
8 California League movants do. *See* Doc. 48-1 at 10-21. But they cannot possibly satisfy the require-
9 ments of Rule 24(a)(2). Their interest in promoting mail voting, Doc. 48-1 at 13-14, is already fully
10 represented by the Democratic Party. *See* Doc. 53 at 2. And their interest in protecting California’s
11 referendum and initiative processes, Doc. 48-1 at 15, is not remotely threatened by this litigation.
12 This case does not involve a referendum or initiative enacted by the people of California; it involves
13 an *executive order* issued by the Governor alone. Executive orders are not laws promulgated by
14 “the Legislature,” U.S. Const. Art. I, §4, cl. 1; Art. II, §1, cl. 2—even if referenda and initiatives
15 are (a question that Plaintiffs have not raised, briefed, or argued because it’s irrelevant to this case).

16 This Court should deny the pending motions to intervene and instead permit the movants to
17 participate as amici.

18 Respectfully submitted,

19 Dated: June 17, 2020

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CERTIFICATE OF SERVICE

I electronically filed this opposition with the Clerk of the Court using the CM/ECF system, which will electronically notify all persons requiring notice.

Dated: June 17, 2020

/s/ Bryan K. Weir
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