

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

STATE OF SOUTH CAROLINA,

Plaintiff,

v.

UNITED STATES OF AMERICA and
ERIC H. HOLDER, JR.,
in his official capacity as Attorney General,

Defendants,

and

JAMES DUBOSE, JUNIOR GLOVER,
FAMILY UNIT, INC., BRENDA C.
WILLIAMS, M.D., and AMANDA WOLF,

Defendant-
Intervenors,

and

LEAGUE OF WOMEN VOTERS OF
SOUTH CAROLINA,

Proposed Defendant-
Intervenor.

Case No. 1:12-cv-203 (CKK, BMK, JDB)

APPLICANT’S MOTION TO INTERVENE AS DEFENDANT

Pursuant to Fed. R. Civ. P. 24, the League of Women Voters of South Carolina (“Applicant”) respectfully moves to intervene in this case as a party defendant. Pursuant to Local Civil Rule 7(j), a copy of the Complaint (Dkt. No. 1), which sets forth the claims for which intervention is sought, is attached as Exhibit 1. Applicant’s proposed Answer to that Complaint is attached at Exhibit 2.

For the reasons set forth in the accompanying memorandum, Applicant is entitled to intervention as of right under Fed. R. Civ. P. 24(a); in the alternative, this Court should permit Applicant to intervene permissively under Fed. R. Civ. P. 24(b).

Pursuant to Local Civil Rule 7(m), the undersigned states that Applicant has sought to confer with Plaintiff's attorneys, but has not received a response to date. Counsel for the Applicant also conferred with the attorneys of Defendant-Intervenors James Dubose, Junior Glover, Family Unit, Inc., Brenda C. Williams, M.D., and Amanda Wolf, who advised they do not oppose intervention, and with Defendants' attorneys, who advised that they do not oppose permissive intervention.

Dated: March 26, 2012

Respectfully submitted,

/s/ Mark A. Posner

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CERTIFICATE OF SERVICE

I, Mark A. Posner, certify that on March 26, 2012, I filed and served the foregoing Motion to Intervene (including Exhibits 1 and 2 thereto), a supporting memorandum (including Exhibits A and B thereto), a proposed order, a Local Civil Rule 7.1 certificate, notices of appearance, and motions for admission *pro hac vice* by emailing PDF copies of the same to the Clerk's Office (dcd_cmecf@dcd.uscourts.gov) and the following counsel:

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