UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

COMMON CAUSE RHODE ISLAND, LEAGUE OF WOMEN VOTERS OF RHODE ISLAND, MIRANDA OAKLEY, BARBARA MONAHAN, and MARY BAKER, *Plaintiffs*, v. NELLIE M. GORBEA, in her official capacity as Secretary of State of Rhode Island; DIANE C. MEDEROS, LOUIS A. DESIMONE JR., JENNIFER L. JOHNSON, RICHARD H. PIERCE, ISADORE S. RAMOS, DAVID H. SHOLES, and WILLIAM E. WEST, in their official capacities as members of the Rhode Island Board of Elections, *Defendants*, REPUBLICAN NATIONAL COMMITTEE and RHODE ISLAND REPUBLICAN PARTY, [*Proposed*] *Intervenor-Defendants*.	Case No. 1:20-cv-00318-MSM-LDA

MEMORANDUM OF LAW IN SUPPORT OF
EMERGENCY MOTION TO INTERVENE AS DEFENDANTS
BY THE REPUBLICAN NATIONAL COMMITTEE
AND THE RHODE ISLAND REPUBLICAN PARTY

The Court should allow Movants, the Republican National Committee and the Rhode Island Republican Party, to intervene as defendants in this case. As the Democratic Party recently observed, "political parties usually have good cause to intervene in disputes over election rules." *Issa v. Newsom*, Doc. 23 at 2, No. 2:20-cv-01044-MCE-CKD (E.D. Cal. June 8, 2020). That is why, in the recent spate of litigation

over COVID-19, the Democratic and Republican parties have been granted intervention virtually every time they've moved for it.* This Court should do the same here for two independent reasons.

First, Movant satisfies the criteria for intervention as of right under Rule 24(a)(2). Movants' motion is timely; the complaint was filed barely three days ago, this litigation is still in its infancy, and no party will be prejudiced by intervention at this early stage. Movants also have a clear interest in protecting their candidates, voters, and resources from the parties' last-minute attempt to fundamentally alter Rhode Island election law. Finally, no other party adequately represents Movants' interests. The existing

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* *See, e.g.*, *Pavek v. Simon*, Doc. 96, No. 19-cv-3000-SRN-DTS (D. Minn. July 12, 2020) (granting intervention to Donald J. Trump for President, Inc., Republican National Committee, National Republican Senatorial Committee, National Republican Congressional Committee, and Republican Party of Minnesota); *Ariz. Democratic Party v. Hobbs*, Doc. 60, No. 2:20-cv-01143-DLR (D. Ariz. June 26, 2020) (granting intervention to the RNC, Arizona Republican Party, and Donald J. Trump for President, Inc.); *Swenson v. Bostelmann*, Doc. 38, No. 20-cv-459-wmc (W.D. Wis. June 23, 2020) (granting intervention to the RNC and Republican Party of Wisconsin); *Edwards v. Vos*, Doc. 27, No. 20-cv-340-wmc (W.D. Wis. June 23, 2020) (same); *League of Women Voters of Minn. Ed. Fund v. Simon*, Doc. 52, No. 20-cv-1205 ECT/TNL (D. Minn. June 23, 2020) (granting intervention to the RNC, the Republican Party of Minnesota, and Donald J. Trump for President, Inc.); *Issa v. Newsom*, 2020 WL 3074351, at *4 (E.D. Cal. June 10, 2020) (granting intervention to the DCCC and the Democratic Party of California); *Nielsen v. DeSantis*, Doc. 101, No. 4:20-cv-236-RH (N.D. Fla. May 28, 2020) (granting intervention to the RNC, NRCC, and Republican Party of Florida); *Priorities USA v. Nessel*, 2020 WL 2615504, at *5 (E.D. Mich. May 22, 2020) (granting intervention to the RNC and Republican Party of Michigan); *Thomas v. Andino*, 2020 WL 2306615, at *4 (D.S.C. May 8, 2020) (granting intervention to the South Carolina Republican Party); *Corona v. Cegavske*, Order Granting Mot. to Intervene, No. CV 20-OC-644-1B (Nev. 1st Jud. Dist. Ct. Apr. 30, 2020) (granting intervention to the RNC and Nevada Republican Party); *League of Women Voters of Va. v. Va. State Bd. of Elections*, Doc. 57, No. 6:20-cv-24-NKM (W.D. Va. Apr. 29, 2020) (granting intervention to the Republican Party of Virginia); *Paher v. Cegavske*, 2020 WL 2042365, at *2 (D. Nev. Apr. 28, 2020) (granting intervention to four Democratic Party entities); *Democratic Nat'l Comm. v. Bostelmann*, 2020 WL 1505640, at *5 (W.D. Wis. Mar. 28, 2020) (granting intervention to the RNC and Republican Party of Wisconsin); *Gear v. Knudson*, Doc. 58, No. 3:20-cv-278 (W.D. Wis. Mar. 31, 2020) (same); *Lewis v. Knudson*, Doc. 63, No. 3:20-cv-284 (W.D. Wis. Mar. 31, 2020) (same).

Defendants have demonstrated an unwillingness to defend the law, as evidenced by the Rhode Island Board of Elections' call for an emergency hearing the day after this suit was filed to consider and "vote upon the entry of a consent order, including possible modification to the witness/notary public requirements for mail ballots." Exhibit A. Movants' intervention will likely provide the *only* adversarial testing of Plaintiffs' claims.

Second, and alternatively, the Court should grant Movants permissive intervention under Rule 24(b). Again, this motion is timely. Movants' defenses share common questions of law and fact with the existing parties, and intervention will result in no delay or prejudice. The Court's resolution of the important questions here will have significant implications for Movants as they work to ensure that candidates and voters have the undeterred opportunity to participate in fair elections, both in the September primary and the November election.

Whether under Rule 24(a)(2) or (b), Movants should be allowed to intervene as defendant.

INTERESTS OF PROPOSED INTERVENOR

Movants are a political committee and a political party that support Republicans in Rhode Island. The Republican National Committee is a national committee as defined by 52 U.S.C. §30101. It manages the Republican Party's business at the national level, supports Republican candidates for public office at all levels, coordinates fundraising and election strategy, and develops and promotes the national Republican platform. The Republican Party of Rhode Island is a recognized political party that

works to promote Republican values and to assist Republican candidates in obtaining election to partisan federal, state, and local office. Movants have interests—their own and those of their members—in the rules governing Rhode Island elections.

ARGUMENT

I. Movants are entitled to intervene as of right.

The First Circuit has not adopted the "more restrictive criteria" of other circuits regarding intervention and instead focuses on the "varied factual situations" of each case. *Conservation Law Found. of New England, Inc. v. Mosbacher*, 966 F.2d 39, 42 (1st Cir. 1992). Under Rule 24(a)(2), this Court must grant intervention as of right if:

1. The motion is timely;
2. Movants have a legally protected interest in this action;
3. This action may impair or impede that interest; and
4. No existing party adequately represents Movants' interests.

R & G Mortg. Corp. v. Fed. Home Loan Mortg. Corp., 584 F.3d 1, 7 (1st Cir. 2009). Movants satisfy each of these requirements.

A. The motion is timely.

The Court considers four factors in determining the timeliness of a motion to intervene: (1) the length of time Movants knew their interests were at risk; (2) the prejudice to existing parties should the Court allow intervention; (3) the prejudice to Movants should the Court deny intervention; and (4) any other special circumstances. *R & G Mortg. Corp.*, 584 F.3d at 7. These factors all favor Movants.

Movants filed this motion rapidly—only three days after the complaint was filed and immediately after Movants learned of the lawsuit. *See e.g., Students for Fair Admissions,*

Inc. v. President & Fellows of Harvard Coll., 308 F.R.D. 39, 46 (D. Mass.), *aff'd*, 807 F.3d 472 (1st Cir. 2015) (motion filed five months after the complaint was timely). This litigation has not substantially progressed—Plaintiffs' just filed for an emergency motion for a temporary restraining order and all that has occurred is a Zoom conference on July 24, 2020. *See Geiger v. Foley Hoag LLP Ret. Plan*, 521 F.3d 60, 65 (1st Cir. 2008) (motion brought nine months after suit's filing was timely because the case had not "progressed beyond the initial stages"). As "the most important factor," the fleeting time between Movants learning of the suit and moving to intervene should decide the timeliness inquiry. *In re Efron*, 746 F.3d 30, 35 (1st Cir. 2014).

Nor will Movants' intervention prejudice the parties. The Court has ruled on no motions, granted no relief, and heard no arguments from the parties beyond the initial complaint. *See Geiger*, 521 F.3d at 64 (allowing intervention even after the court had already issued a preliminary injunction did not unduly prejudice the parties); *Students for Fair Admissions*, 308 F.R.D. at 46 (allowing intervention "in the very early stages of discovery" did not prejudice the parties).

If Movants are barred from intervening, however, their interests in this case will be irreparably harmed by an injunction that suspends Rhode Island law in the upcoming September primary. Movants "obviously would be better off if [they] could defend directly against [Plaintiffs'] claims." *Efron*, 746 F.3d at 36. Movants' motion is thus timely.

B. Movants have protected interests in this action.

Movants also have "'a significantly protectable interest,'" in the subject matter of the litigation. *Pub. Serv. Co. of N.H. v. Patch*, 136 F.3d 197, 205 (1st Cir. 1998). Movants' interests are "direct" and "bear a 'sufficiently close relationship' to the dispute between the original litigants." *Travelers Indem. Co. v. Dingwell*, 884 F.2d 629, 638 (1st Cir. 1989). Additionally, "the Court of Appeals for the First Circuit has rejected a narrow reading of Rule 24(a)'s interest requirement. *Maine v. Norton*, 203 F.R.D. 22, 28 (D. Me.) (citing *Daggett v. Comm. on Gov. Ethics and Election Practices*, 172 F.3d 104, 110 (1st Cir. 1999)), *aff'd sub nom. State v. Dir., U.S. Fish & Wildlife Serv.*, 262 F.3d 13 (1st Cir. 2001).

Movants' interests in this action are, at a minimum, equal to Plaintiffs'. Like Plaintiffs, Movants are political organizations that work "to influence public policy" and "promote[] representative democracy." Compl. ¶10, 12. Also like Plaintiffs, Movants' members are "registered voter[s]" with a direct stake in Rhode Island elections. Compl. ¶14-16. Plaintiffs claim that existing law requires them "to divert resources" to "educat[e] voters about the witness requirement." Compl. ¶11. But if Plaintiffs obtain their requested relief, Movants will have to spend substantial resources informing voters of sudden reversals in voting procedure mere weeks before the next election. Thus, if Plaintiffs have standing to challenge this law, it must also be true that Movants have an interest in defending it.

But even considered in isolation, Movants have "direct" and "significant" interests in the continued enforcement of state laws governing witness requirements,

absentee ballots, and voter identification, as those laws are designed to serve "the integrity of [the] election process," *Eu v. San Fran. Cty. Democratic Cent. Comm.*, 489 U.S. 214, 231 (1989), and the "orderly administration" of elections, *Crawford v. Marion Cty. Election Bd.*, 553 U.S. 181, 196 (2008) (op. of Stevens, J.). Movants, as "intended beneficiaries of a regulatory scheme designed to allow them to compete" in fair elections, have "direct … competitive interests" in the enforcement of Rhode Island's elections laws. *Verizon New England v. Maine Pub. Utilities Comm'n*, 229 F.R.D. 335, 337 (D. Me. 2005). Federal courts "routinely" find that political parties have interests supporting intervention in litigation regarding elections and election procedures. *Issa*, 2020 WL 3074351, at *3. Indeed, given their inherent and broad-based interest in elections, usually "[n]o one disputes" that a political party "meet[s] the impaired interest requirement for intervention as of right." *Citizens United v. Gessler*, 2014 WL 4549001, *2 (D. Col. Sept. 15, 2014). That is certainly true where, as here, "changes in voting procedures could affect candidates running as Republicans and voters who [are] members of the … Republican Party." *Ohio Democratic Party v. Blackwell*, 2005 WL 8162665, *2 (S.D. Ohio Aug. 26, 2005); *see id.* (under such circumstances, "there [was] no dispute that the Ohio Republican Party had an interest in the subject matter of this case").

In short, because Movants' candidates "actively seek [election or] reelection in contests governed by the challenged rules," and because their members' ability to participate in those elections is governed by the challenged rules, Movants have an

interest in "demand[ing] adherence" to those requirements. *Shays v. FEC*, 414 F.3d 76, 88 (D.C. Cir. 2005).

C. This action threatens to impair Movants' interests.

Movants are "so situated that disposing of [this] action may as a practical matter impair or impede the movant's ability to protect its interest." Fed. R. Civ. P. 24(a)(2). Movants "[do] not need to establish that [their] interests *will* be impaired," "only that the disposition of the action 'may' impair or impede [their] ability to protect [their] interests." *Brumfield v. Dodd*, 749 F.3d 339, 344 (5th Cir. 2014). This language in Rule 24 is "obviously designed to liberalize the right to intervene in federal actions." *Nuesse v. Camp*, 385 F.2d 694, 701 (D.C. Cir. 1967).

Here, the risks to Movants' interests are plain. If this court grants the parties' proposed consent decree, then the rules surrounding absentee ballots will be upended just weeks before the September primary. "[T]he state [defendants] could be subject to a federal court injunction against implementation of the [witness-signature] statute," and therefore "[t]he 'practical' test of adverse effect that governs under Rule 24(a) is easily satisfied here." *Daggett*, 172 F.3d at 110. Not only would such an injunction undercut democratically enacted laws that protect voters and candidates (including Movants' members), it would change the "structur[e] of th[e] competitive environment" and "fundamentally alter the environment in which [Movant] defend[s] [its] concrete interests (e.g. [its] interest in … winning [election or] reelection)." *Shays*, 414 F.3d at 85-86. These late changes also threaten to confuse voters and undermine confidence in the

electoral process. *See Purcell v. Gonzalez*, 549 U.S. 1, 4-5 (2006) ("Court orders affecting elections … can themselves result in voter confusion and consequent incentive to remain away from the polls. As an election draws closer, that risk will increase."). In addition to that independent harm, Movants will be forced to spend substantial resources informing Republican voters of changes in the law, fighting inevitable confusion, and galvanizing participation in the wake of the "consequent incentive to remain away from the polls." *Id.*

Moreover, "as a practical matter," Fed. R. Civ. P. 24(a)(2), "there can be no real dispute that the [Movants'] interests would be adversely affected if the present suit were lost by the defendants." *Daggett*, 172 F.3d at 110. Even setting aside the long-term effects on the integrity of elections and public confidence in the electoral process, this proceeding might be the *only* time that Movants can litigate the witness-signature requirement. The primary is weeks away. *See* Compl. ¶20. In a very real sense, then, this Court's decision on the temporary restraining order or entry of consent judgment could be the final word on the laws governing the next election. Thus, "[i]f [Movants] [are] not permitted to intervene in this action, [they] will likely find [themselves] without an adequate remedy." *New Hampshire Ins. Co. v. Greaves*, 110 F.R.D. 549, 552 (D.R.I. 1986). Because the "very purpose of intervention is to allow interested parties to air their views so that a court may consider them *before* making potentially adverse decisions," *Brumfield*, 749 F.3d at 345 (emphasis added), the "best" course—and the one that Rule 24 "implements"—is to give "all parties with a real stake in a controversy … an

opportunity to be heard" in this suit, *Hodgson v. United Mine Workers of Am.*, 473 F.2d 118, 130 (D.C. Cir. 1972).

D. The parties do not adequately represent Movants' interests.

Finally, Movants satisfy the final prong of intervention as of right because "no 'existing party adequately represents [their] interest.'" *Students for Fair Admissions, Inc. v. President & Fellows of Harvard Coll.*, 807 F.3d 472, 475 (1st Cir. 2015). Although the burden of showing inadequate representation is typically "minimal," the First Circuit presumes that "a government defendant will 'adequately represent' the interests of all private defenders of the statute or regulation unless there is a showing to the contrary." *Massachusetts Food Ass'n v. Massachusetts Alcoholic Beverages Control Comm'n*, 197 F.3d 560, 567 (1st Cir. 1999). But "to overcome the presumption, the intervenor need only offer 'an adequate explanation as to why' it is not sufficiently represented by the named party." *B. Fernandez & Hnos., Inc. v. Kellogg USA, Inc.*, 440 F.3d 541, 546 (1st Cir. 2006). The First Circuit has "stressed the case-specific nature of this inquiry" and "discouraged district courts from identifying only a limited number of 'cubbyholes' for inadequate representation claims." *B. Fernandez & Hnos.*, 440 F.3d at 546. Finally, because Movants have a "tangible and substantial stake in the outcome of this case … the burden on [Movants] to show inadequate representation is lighter than if its interest was 'thin and widely shared.'" *Id.*

Plaintiffs clearly do not represent Movants' interests, and Defendants do not adequately represent them either. Every single Defendant in this case has already

adopted *Plaintiffs' position* on the witness-signature requirement, thus demonstrating "adversity of interest, collusion, or nonfeasance." *B. Fernandez & Hnos.*, 440 F.3d at 546. As Plaintiffs recognize, Defendant Secretary of State proposed legislation eliminating the witness-signature requirement for the 2020 elections. Compl. ¶35. When the legislation failed, Defendant Secretary petitioned the Governor to suspend the witness-signature requirement. Compl. ¶55. Going a step further, the Board Defendants voted to support the suspension of the witness-signature requirement for the September and November elections. Compl. ¶57. Because Defendants have all acquiesced to Plaintiff's position, this "is a textbook example of an entitlement to intervention as of right." *In re Grand Jury Subpoena*, 274 F.3d 563, 570 (1st Cir. 2001).

Movants, by contrast, affirmatively seek to enforce the witness-signature requirement and prevent last-minute changes to Rhode Island's election laws. And Movants' interests will continue to differ from Defendants' as this litigation proceeds on the temporary restraining order, any proposed consent decree, the merits as applied to the upcoming elections, and any appeals. Movants thus occupy an adversarial position in this case that no existing party serves. Its "intervention [is] vital to the defense of the law[s] at issue" in this case. *Miracle v. Hobbs*, 333 F.R.D. 151, 155 (D. Ariz. 2019) (citing *Horne v. Flores*, 557 U.S. 433, 433 (2009)).

Even if Defendants had not already demonstrated support for Plaintiffs' claims, "[Movants'] interests are sufficiently different in kind or degree from those of the

named party." *B. Fernandez & Hnos.*, 440 F.3d at 546. As Judge Garland has explained, courts "often conclude[] that governmental entities do not adequately represent the interests of aspiring intervenors." *Fund for Animals, Inc. v. Norton*, 322 F.3d 728, 736 (D.C. Cir. 2003). Defendants necessarily represent "the public interest," rather than Movants' "particular interest[s]" in protecting their resources and the rights of their candidates and voters. *Coal. of Ariz./N.M. Counties for Stable Economic Growth v. DOI*, 100 F.3d 837, 845 (10th Cir. 1996). Defendants have no interest in the election of particular candidates or the mobilization of particular voters, or the costs associated with either.

Instead, Defendants, acting on behalf of all Rhode Island voters and the state itself, must balance "a range of interests likely to diverge from those of the intervenors." *Meek v. Metro. Dade Cty.*, 985 F.2d 1471, 1478 (11th Cir. 1993). Those interests include "the expense of defending the current [laws] out of [state] coffers," *Clark v. Putnam Cty.*, 168 F.3d 458, 461 (11th Cir. 1999), "the social and political divisiveness of the election issue," *Meek*, 985 F.2d at 1478, "their own desires to remain politically popular and effective," *id.*, and even the interests of opposing parties, *In re Sierra Club*, 945 F.2d 776, 779-80 (4th Cir. 1991). Thus, "[t]he potential for this litigation to have a greater adverse impact on [Movants] is a sufficient basis for concluding that [Defendants] may not serve as an adequate proxy." *B. Fernandez & Hnos.*, 440 F.3d at 547.

Because the existing parties "[have] no incentive to protect the intervenors' interests," *In re Grand Jury Subpoena*, 274 F.3d at 570, "there is sufficient doubt about the

adequacy of representation to warrant intervention." *B. Fernandez & Hnos.*, 440 F.3d at 547. Movants should thus be granted intervention as of right.

II. Alternatively, Movants are entitled to permissive intervention.

Even if Movants were not entitled to intervene as of right under Rule 24(a), this Court should grant Movants permissive intervention under Rule 24(b). Exercising "broad discretion," courts grant permissive intervention when the movant has "a claim or defense that shares with the main action a common question of law or fact." Fed. R. Civ. P. 24(b); *Daggett*, 172 F.3d at 113. The court also must consider "whether the intervention will unduly delay or prejudice the adjudication of the original parties' rights." Fed. R. Civ. P. 24(b)(3).

The requirements of Rule 24(b) are met here. As explained, Movants filed a timely motion. *Supra* I.A. And Movants will raise defenses that share many common questions with the parties' claims and defenses—including whether COVID-19 means that Rhode Island's well-established election laws now create an unconstitutional burden on the right to vote. *See* Compl. ¶¶58-63. Plaintiffs allege that the challenged laws are unconstitutional. Compl. ¶63. Movants, on the other hand, directly reject those allegations, contending not only that Rhode Island's longstanding laws are constitutional, but also that Plaintiffs' desired relief would undermine the interests of Movants and their members. Movants thus meet the "low threshold" of demonstrating a commonality of claims and defenses. *Massachusetts Food Ass'n*, 197 F.3d at 568. At the

very least, Movants "may be helpful in fully developing the case, [which] is a reasonable consideration in deciding on permissive intervention." *Daggett*, 172 F.3d at 113.

Movants' intervention will not unduly delay this litigation or prejudice anyone. Movants swiftly moved to intervene at the soonest possible moment, and no party can claim prejudice because of Movants' intervention. After all, Plaintiffs put the constitutionality of the laws at issue and "can hardly be said to be prejudiced by having to prove a lawsuit [they] chose to initiate." *Security Ins. Co. of Hartford v. Schipporeit, Inc.*, 69 F.3d 1377, 1381 (7th Cir. 1995). Movants commit to submitting all filings in accordance with whatever briefing schedule the Court imposes, "which is a promise" that undermines claims of undue delay. *Emerson Hall Assocs., LP v. Travelers Casualty Ins. Co. of Am.*, 2016 WL 223794, *2 (W.D. Wis. Jan. 19, 2016).

Allowing Movants to intervene will promote consistency and fairness in the law, as well as efficiency in this case. "Surely it runs counter to our notions of fairness and justice to find that the [parties] would be harmed by being forced to face a stronger, more vigorous opposition. The role of this court and the judicial process is to reach a just and equitable resolution based on the facts, a task which can only be aided and served by the assistance of the strongest possible arguments by counsel." *New Hampshire Ins. Co. v. Greaves*, 110 F.R.D. 549, 552 (D.R.I. 1986). Allowing intervention by political parties in a "time-sensitiv[e]" "election-related dispute" also preempts the delay that otherwise results from sorting out Movants' rights on appeal. *See Jacobson v. Detzner*, 2018 WL 10509488 (N.D. Fla.) ("[D]enying [Republican Party organizations'] motion [to

intervene] opens the door to delaying the adjudication of this case's merits for months—if not longer"); *Stringfellow v. Concerned Neighbors in Action*, 480 U.S. 370, 377 (1987) ("[W]hen an order prevents a putative intervenor from becoming a party in *any* respect, the order is subject to immediate review."). Finally, if the parties propose a consent decree, Movants are "entitled to one opportunity to litigate [its] contention" that the witness-signature requirement is constitutional. *Puerto Rico Tel. Co. v. Sistema de Retiro de los Empleados del Gobierno y la Judicatura*, 637 F.3d 10, 17 (1st Cir. 2011) ("A judgment thus reached through the concurrence of parties with aligned interests, while it binds the parties who participated, does not establish law that determines the interests of strangers to the litigation."). In short, permitting intervention in this case is "simpler, speedier, and more efficient for all." *Puerto Rico Tel. Co.*, 637 F.3d at 16.

CONCLUSION

The Court should grant Movants' motion and allow them to intervene as defendants.

Dated: July 26, 2020

Respectfully submitted,

/s/ Brandon S. Bell
Brandon S. Bell (#5871)
FONTAINE BELL, LLP
1 Davol Sq. Penthouse
Providence, RI 02903
(401) 274-8800 (Tel)
(401) 274-8880 (Fax)
bbell@fontainebell.com

/s/ Thomas R. McCarthy
Thomas R. McCarthy (pending *pro hac vice*)
Patrick N. Strawbridge (pending *pro hac vice*)
Cameron T. Norris (pending *pro hac vice*)
CONSOVOY MCCARTHY PLLC
1600 Wilson Blvd., Ste. 700
Arlington, VA 22209
(703) 243-9423
tom@consovoymccarthy.com

/s/ Joseph S. Larisa, Jr.
Joseph S. Larisa, Jr. (#4113)
LARISA LAW
50 South Main Street, Suite 311
Providence, RI 02903
(401) 743-4700 (Tel)
(401) 633-6296 (Fax)
joe@larisalaw.com

Counsel for Proposed Intervenor-Defendants
Republican National Committee and Rhode Island Republican Party

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and that paper copies will be sent to all those non-registered participants on July 27, 2020.

/S/ BRANDON S. BELL