

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION

AMERICA FIRST POLICY INSTITUTE et  
al.,

*Plaintiffs,*

vs.

JOSEPH R. BIDEN, JR., in his official  
capacity as President of the United States, et  
al.,

*Defendants.*

**No. 2:24-cv-152-Z**

**MOTION TO INTERVENE BY PROPOSED INTERVENOR-DEFENDANTS LEAGUE  
OF WOMEN VOTERS, BLACK VOTERS MATTER, AND NAEVA**

Pursuant to Rule 24(a) of the Federal Rules of Civil Procedure, the League of Women Voters, Black Voters Matter and Naeva (collectively, the “Proposed Intervenor-Defendants”) respectfully move to intervene as a matter of right as party-defendants in the above-captioned matter. In the alternative, the Proposed Intervenor-Defendants respectfully move for permissive intervention under Federal Rule of Civil Procedure 24(b). This motion is supported by the attached memorandum of law. Proposed Intervenor-Defendants also attach their proposed motion to dismiss and accompanying memoranda to be filed in the event that intervention is granted.

Dated: September 14, 2024

Ryan Patrick Brown  
TX Bar No. 24073967  
Ryan Brown, Attorney at Law, P.L.L.C.  
1222 S Fillmore St.  
Amarillo, TX 79101  
(806) 372-5711  
info@ryanbrownattorneyatlaw.com

John A. Freedman\*  
Samuel Kleinman\*  
ARNOLD & PORTER KAYE SCHOLER LLP  
601 Massachusetts Ave. NW  
Washington, DC 20001  
(202) 942-5000  
john.freedman@arnoldporter.com  
sam.kleinman@arnoldporter.com

Jeffrey A. Fuisz\*  
ARNOLD & PORTER KAYE SCHOLER LLP  
250 West 55th St.  
New York, NY 10019  
(212) 836-8000  
jeffrey.fuisz@arnoldporter.com

Sarah Gryll\*  
ARNOLD & PORTER KAYE SCHOLER LLP  
70 West Madison St.  
Suite 4200  
Chicago, IL 60602  
(312) 583-2300  
sarah.gryll@arnoldporter.com

Niyati Shah\*  
Noah Baron\*  
Alizeh Ahmad\*  
ASIAN AMERICANS ADVANCING  
JUSTICE-AAJC  
1620 L Street, NW, Suite 1050  
Washington, DC 20036  
(202) 296-2300  
nshah@advancingjustice-aajc.org  
nbaron@advancingjustice-aajc.org  
aahmad@advancingjustice-aajc.org  
Rose Murray\*

Respectfully Submitted,

/s/ Edgar Saldivar  
Edgar Saldivar  
TX Bar No. 24038188  
Thomas Buser-Clancy\*  
TX Bar No. 24078344  
Ashley Harris\*  
TX Bar No. 24123238  
Adriana Piñon\*  
TX Bar No. 24089768  
ACLU FOUNDATION OF TEXAS, INC.  
1018 Preston St.  
Houston, TX 77002  
Tel: (713) 942-8146  
Fax: (713) 942-8966  
esaldivar@aclutx.org  
tbuser-clancy@aclutx.org  
aharris@aclutx.org  
apinon@aclutx.org

Sarah Brannon\*  
Jacob van Leer\*  
Voting Rights Project  
ACLU FOUNDATION  
915 15th St. NW  
Washington, DC 20005  
(202) 210-7287  
sbrannon@aclu.org  
jvanleer@aclu.org

Sophia Lin Lakin\*  
Ming Cheung\*  
Voting Rights Project  
ACLU FOUNDATION  
125 Broad St.  
New York, NY 10004  
Mcheung@aclu.org

Leah J. Tulin\*  
BRENNAN CENTER FOR JUSTICE AT  
NYU SCHOOL OF LAW  
1140 Connecticut Ave. NW, Suite 1150  
Washington, DC 20036  
(202) 650-6397  
tulini@brennan.law.nyu.edu

Ahmed Soussi\*  
SOUTHERN POVERTY LAW CENTER  
201 Saint Charles Ave., Suite 2000  
New Orleans, Louisiana 70170  
(504) 579-3175  
rose.murray@splcenter.org  
ahmed.soussi@splcenter.org

Lauren Miller Karalunas\*  
BRENNAN CENTER FOR JUSTICE AT  
NYU SCHOOL OF LAW  
120 Broadway, Suite 1750  
New York, NY 10271  
(646) 292-8310  
millerl@brennan.law.nyu.edu

*Attorneys for League of Women Voters and Black Voters Matter*

Jacqueline D. De León\*  
Allison A. Neswood\*  
NATIVE AMERICAN RIGHTS FUND  
250 Arapahoe Ave.  
Boulder, CO 80302  
(303) 447-8760  
jdeleon@narf.org  
neswood@narf.org

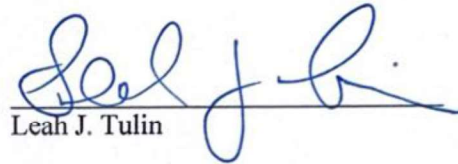
Samantha B. Kelty\*  
TX Bar No. 24085074  
NATIVE AMERICAN RIGHTS FUND  
950 F St. NW, Suite 1050,  
Washington, DC 20004  
(202) 785-4166  
kelty@narf.org

*Attorneys for Naeva*

*\*Application for Admission Pro Hac Vice Forthcoming*

**CERTIFICATE OF CONFERENCE**

I certify that on September 13, 2024, pursuant to Local Rule 7.1 (a), Counsel for Proposed-Intervenor Defendants reached out to Counsel for the Plaintiffs and the Federal Defendants in this matter regarding this Motion. Counsel sent an email to all counsel of record asking their positions on Intervention. Counsel for both Plaintiffs and Defendants responded that they have no position at this time and would take a position once they review the papers. Accordingly, it is not known at this time if this motion will be opposed.

  
Leah J. Tulin

**CERTIFICATE OF SERVICE**

I certify that on September 14, 2024, the foregoing document was filed on the Court's CM/ECF system, which sent notification of such filing to all counsel of record.

/s/ Edgar Saldivar  
Edgar Saldivar