

DENNIS EUCKE et al.,
Plaintiffs,

v.

WISCONSIN ELECTIONS
COMMISSION et al.,
Defendants.

Case No. 2024CV007822
Case Code: 30952

**[PROPOSED] NOTICE OF MOTION AND MOTION TO INTERVENE OF
BLACK LEADERS ORGANIZING FOR COMMUNITIES, SOULS TO THE POLLS,
AND WISDOM**

PLEASE TAKE NOTICE THAT, pursuant to Wis. Stat. § 803.09, Proposed Intervenor-Defendants Black Leaders Organizing for Communities, Souls to the Polls, and WISDOM—collectively, “Proposed Intervenor-Defendants”—hereby move to intervene as Defendants in this action and ask the Court to consider their motion at the earliest convenient opportunity.

Black Leaders Organizing for Communities, Souls to the Polls, and WISDOM seek intervention as of right under Wis. Stat. § 803.09(1) or, alternatively, permissive intervention under Wis. Stat. § 803.09(2). In support of this motion, Proposed Intervenor-Defendants are filing:

- a companion brief in support of this motion to intervene;
- client declarations from each of the Proposed Intervenor-Defendants in support of the motion to intervene (Exhibits A–C);
- Proposed Intervenor-Defendants’ proposed answer and defenses (Exhibit D);
- Proposed Intervenor-Defendants’ proposed motion to dismiss and in opposition to Plaintiffs’ request for expedited relief (Exhibit E); and
- a proposed order on Plaintiffs’ motion to intervene.

Accordingly, and for the reasons set forth in the accompanying materials, Black Leaders Organizing for Communities, Souls to the Polls, and WISDOM respectfully move the Court to intervene as Defendants in this matter.

Date: October 15, 2024

Respectfully submitted,

R. Timothy Muth

Megan C. Keenan*
American Civil Liberties Union Foundation
915 15th St. NW
Washington, DC 20001
(740) 632-0671
mkeenanaclu.org

R. Timothy Muth (Wis. Bar No. 1010710)
ACLU of Wisconsin Foundation
207 E. Buffalo Street, Suite 325
Milwaukee, WI 53202
(414) 272-4032
tmuthaclu-wi.org

Sophia Lin Lakin*
Davin Rosborough*
125 Broad St., 18th Floor
New York, NY 10004
(212) 549-2500
slakinaclu.org
drosboroughaclu.org

Patrick Miller (Wis. Bar No. 1035040)
Faegre Drinker Biddle & Reath LLP
1177 Avenue of the Americas, 41st Floor
New York, NY 10036
(212) 248-3151
patrick.millerfaegredrinker.com

Michael Perloff*
American Civil Liberties Union Foundation
of the District of Columbia
529 14th Street NW, Ste. 722
Washington, D.C. 20045
(202) 457-0800
mperloffacludc.org

Craig S. Coleman*
Jeffrey P. Justman*
Faegre Drinker Biddle & Reath LLP
2200 Wells Fargo Center
90 South Seventh Street
Minneapolis, MN 55402
(612) 766-7000
craig.colemanfaegredrinker.com
jeff.justmanfaegredrinker.com

*Counsel for Proposed Intervenor-Defendants
BLOC, Souls to the Polls, and WISDOM*

CERTIFICATE OF SERVICE

I certify that, in compliance with Wis. Stat. § 801.18(6), I am electronically filing this Notice of Motion and Motion to Intervene of Proposed Intervenor-Defendants BLOC and Souls to the Polls (and the accompanying brief, exhibits, and proposed order) with the Clerk of Court using the Wisconsin Circuit Court Electronic Filing System, which will accomplish electronic notice and service for all participants who are registered users, and by electronic and certified mail to parties who are not registered users.

Respectfully submitted this 15th day of October, 2024.

R. Timothy Muth
R. Timothy Muth (Wis. Bar No. 1010710)