

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

25-cv-1036-amb

WISCONSIN ELECTIONS
COMMISSION, et al.,

Defendants.

**UNOPPOSED MOTION OF COMMON CAUSE, MELISSA ADAMS, AMANDA
MAKULEC, AND JAIME RIEFER TO INTERVENE AS DEFENDANTS**

Common Cause, Melissa Adams, Amanda Makulec, and Jaime Riefer (collectively, “Proposed Intervenor”) respectfully move to intervene as Defendants pursuant to Rule 24(a) of the Federal Rules of Civil Procedure or, in the alternative, pursuant to Rule 24(b). The grounds for this motion are set forth in the accompanying brief and corresponding declarations.

Proposed Intervenor’s contemporaneously submit a proposed answer by way of a response to the United States’ Complaint (Exhibit 1 to Mot. to Intervene), as well as a proposed motion to dismiss (Exhibit 2 to Mot. to Intervene) and accompanying brief (Exhibit 3 to Mot. to Intervene), while reserving the right to supplement their response to the Complaint within the time allowed for response by Rule 12 if intervention is granted. *See* Fed. R. Civ. P. 24(c).

Proposed Intervenor’s also contemporaneously submit the declarations of Bianca N. Shaw, Melissa Adams, Amanda Makulec, and Jaime Riefer.

Finally, Proposed Intervenor’s attach the following documents as exhibits to their memorandum in support of intervention:

- a proposed memorandum of understanding created by the U.S. Department of Justice (Exhibit 1 to Br. in Support of Intervention);

- a December 4, 2025 transcript and December 15, 2025 order in a related case, *United States v. Weber*, No. 25-cv-09149 (C.D. Cal. Dec. 15, 2025) (Exhibits 2 and 4 to Br. in Support of Intervention, respectively); and
- an exhibit containing a letter sent by the United States in a related case, *United States v. Pennsylvania*, No. 25-cv-01481 (W.D. Pa. Oct. 9, 2025) (Exhibit 3 to Br. in Support of Intervention).

Counsel for Proposed Intervenors conferred about this motion with counsel for Plaintiff and Defendants. Both counsel for Plaintiffs and counsel for Defendants informed counsel for Proposed Intervenors that the existing parties take no position on this motion.

Dated: January 8, 2026

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Respectfully submitted,

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**Application for admission forthcoming*

*Attorneys for Proposed Intervenors
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CERTIFICATE OF SERVICE

I hereby certify that on January 8, 2026, a true and correct copy of the foregoing document was served via the Court's ECF system on all counsel of record who have consented to electronic service. All other counsel will be served in accordance with Federal Rule of Civil Procedure 5(a).

/s/ Douglas M. Poland