

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 Intervenors”) 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 Intervenors 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 Intervenors also contemporaneously submit the declarations of Bianca N. Shaw, Melissa Adams, Amanda Makulec, and Jaime Riefer.

Finally, Proposed Intervenors 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

Respectfully submitted,

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

Sophia Lin Lakin\*  
American Civil Liberties Union  
Foundation  
125 Broad St., 18th Floor  
New York, NY 10004  
(212) 549-2500  
slakin@aclu.org

/s/ Douglas M. Poland  
Douglas M. Poland, SBN 1055189  
Scott B. Thompson, SBN 1098161  
Law Forward, Inc.  
222 W. Washington Ave., Ste. 680  
Madison, WI 53703  
dpoland@lawforward.org  
sthompson@lawforward.org  
608.283.9822

Ryan V. Cox, SBN 1140899  
ACLU of Wisconsin Foundation, Inc.  
207 East Buffalo Street, Suite 325  
Milwaukee, WI 53202  
Tel.: (414) 272-4032  
Fax: 414-272-0182  
rcox@aclu-wi.org

\**Application for admission forthcoming*

*Attorneys for Proposed Intervenors  
Common Cause, Melissa Adams, Amanda  
Makulec, and Jaime Riefer*

**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*