

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA, MONROE DIVISION**

THE STATE OF LOUISIANA,  
by and through its Attorney General,  
LIZ MURRILL; and NANCY LANDRY,  
Louisiana Secretary of State,

*Plaintiffs,*

v.

THE UNITED STATES ELECTION  
ASSISTANCE COMMISSION; and  
BRIANNA SCHLETZ, in her official  
capacity as the Executive Director of the  
United States Election Assistance  
Commission,

*Defendants.*

Civil Action No. 3:26-cv-01191

**LEAGUE INTERVENORS' MOTION TO INTERVENE AS DEFENDANTS**

Pursuant to Federal Rule of Civil Procedure 24, League of Women Voters of Louisiana and League of Women Voters of Louisiana Education Fund (together, "LWVLA"), Voice of the Experienced ("VOTE"), National Association for the Advancement of Colored People Louisiana State Conference ("Louisiana NAACP"), Power Coalition for Equity and Justice ("Power Coalition," or "PCEJ"), and League of Women Voters of the United States and the League of Women Voters Education Fund (together, "LWV" or "the national League") (collectively, the "League Intervenors") respectfully move to intervene as a matter of right in the above-captioned matter as Defendants. League Intervenors are entitled to intervene as of right under Rule 24(a) because (1) their motion is timely, (2) they have direct and legally protectable interests in this action, (3) which may be impaired by the disposition of this case, and (4) they are not adequately represented by the existing parties.

Alternatively, the Court should grant permissive intervention under Rule 24(b) because League Intervenors have swiftly moved for intervention at the outset of the case and permitting their intervention will not unduly delay or prejudice the existing parties. Their proposed answer, attached hereto as Exhibit 1, raises defenses and other legal issues that present common questions of law and fact with the existing suit. Moreover, several of the League Intervenors—specifically, LWVLA, VOTE, Louisiana NAACP, and PCEJ—are already involved in related litigation over Louisiana’s Act 500. Their distinct perspective and expertise on related litigation and relevant issues of election administration will assist the Court in adjudicating this matter.

Pursuant to Local Rule 7.6, League Intervenors shared a copy of their proposed answer (Exhibit 1) with counsel for both Plaintiffs and Defendants and solicited their positions on the motion on April 16, 2026. Plaintiffs oppose League Intervenors’ motion. At the time of filing, Defendants had not yet indicated their position.

### **REQUEST FOR RELIEF**

For the reasons stated in the accompanying memorandum, League Intervenors’ motion should be granted and their proposed answer accepted for filing. A proposed order granting intervention and accepting Proposed Intervenors’ answer is also attached hereto.

Dated: April 17, 2026

/s/ Sophia Lin Lakin

Sophia Lin Lakin\*  
Ethan Herenstein\*  
Dayton Campbell-Harris\*  
Nina Nayiri McKay\*  
AMERICAN CIVIL LIBERTIES  
UNION FOUNDATION  
125 Broad St., 18th Floor  
New York, NY 10004  
(212) 549-2500  
slakin@aclu.org  
ehenstein@aclu.org  
dcampbell-harris@aclu.org  
nmckay@aclu.org

/s/ Sarah Brannon

Sarah Brannon\*  
Jacob Van Leer \*  
AMERICAN CIVIL LIBERTIES  
UNION FOUNDATION  
915 15th St. NW Washington, DC 20001  
(740) 632-0671  
sbrannon@aclu.org  
jvanleer@aclu.org

/s/ Nora Ahmed

Nora Ahmed (N.Y. Bar. No. 5092374)  
ACLU FOUNDATION OF LOUISIANA  
1340 Poydras St., Suite 2160  
New Orleans, LA 70112  
nahmed@laaclu.org

/s/ Eliza Sweren-Becker

Eliza Sweren-Becker\*  
Jasleen Singh\*  
BRENNAN CENTER FOR JUSTICE AT  
NYU SCHOOL OF LAW  
120 Broadway, Suite 1750  
New York, NY 10271  
(646) 292-8310  
sweren-beckere@brennan.law.nyu.edu  
singhj@brennan.law.nyu.edu

Respectfully submitted,

/s/ Valencia Richardson

Valencia Richardson (LSBA # 39312)  
Danielle Lang\*  
Alice Huling\*  
Anna Baldwin\*  
William Hancock\*  
Alexandra Copper\*  
Heather Szilagyi\*  
Marisa Wright\*  
CAMPAIGN LEGAL CENTER  
1101 14<sup>th</sup> St. NW, Suite 400  
Washington, DC 20005  
Tel: (202) 736-2200  
Fax: (202) 736-2222  
vrichardson@campaignlegalcenter.org  
dlang@campaignlegalcenter.org  
ahuling@campaignlegalcenter.org  
abaldwin@campaignlegalcenter.org  
acopper@campaignlegalcenter.org  
whancock@campaignlegalcenter.org  
hszilagyi@campaignlegalcenter.org  
mwright@campaignlegalcenter.org

/s/ Ahmed Soussi

Ahmed K. Soussi (LSBA # 38414)  
SOUTHERN POVERTY LAW CENTER  
201 St. Charles Avenue, Suite 2000  
New Orleans, LA 70170  
Tel: (334) 213-8303  
ahmed.soussi@splcenter.org

/s/ Bradley E. Heard

Bradley E. Heard\*  
Sabrina Khan\*  
SOUTHERN POVERTY LAW CENTER  
101 17th Street NW, Suite 550  
Washington, DC 20036  
bradley.heard@splcenter.org  
sabrina.khan@splcenter.org

/s/ Robert Weiner

Robert Weiner\*

Jennifer Nwachukwu\*

David Rollins-Boyd\*

Catherine Meza\*

Javon Davis\*

LAWYERS' COMMITTEE

FOR CIVIL RIGHTS UNDER LAW

1500 K Street, Suite 900

Washington, DC 20009

Tel: (202) 662-8600

rweiner@lawyerscommittee.org

jnwachukwu@lawyerscommittee.org

drollins-boyd@lawyerscommittee.org

cmeza@lawyerscommittee.org

jdavis@lawyerscommittee.org

\**Pro hac vice* motion forthcoming

*Counsel for Proposed Intervenor-Defendants  
League of Women Voters of Louisiana, League of  
Women Voters of Louisiana Education Fund,  
Voice of the Experienced, Power Coalition for  
Equity and Justice, Louisiana State Conference of  
the NAACP, League of Women Voters of the  
United States, and the League of Women Voters  
Education Fund*

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, April 17, 2026, I electronically filed the foregoing Motion with the Clerk of the Court using the Court's CM/ECF system, which will send a notice of electronic filing to counsel of record who are registered with the Court's CM/ECF system.

/s/ Valencia Richardson

Valencia Richardson

*Counsel for Proposed  
Intervenor-Defendants*