

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

**United States of America,**

Plaintiff,

v.

**North Carolina State Board of Elections; Sam Hayes**, in his official capacity as Executive Director of the North Carolina State Board of Elections; **Francis X. De Luca, Jeff Carmon, Stacy Eggers IV, Siobhan O'Duffy Millen**, and **Robert Rucho**, in their official capacities as members of the North Carolina State Board of Elections; and **State of North Carolina,**

Defendants.

No. 5:25-cv-00283

**MOTION TO INTERVENE AS DEFENDANTS BY GABRIELA ADLER-ESPINO, RANI DASI, MARY KAY HELING, AUDREY MEIGS, LARRY REPANES, AMY GRACE BRYANT, RALIM ALLSTON, KEMEKA SIDBURY, THE NAACP NORTH CAROLINA STATE CONFERENCE, AND THE LEAGUE OF WOMEN VOTERS OF NORTH CAROLINA**

Gabriela Adler-Espino, Rani Dasi, Mary Kay Heling, Audrey Meigs, Larry Repanes, Amy Grace Bryant, Ralim Allston, Kemeka Sidbury, the NAACP North Carolina State Conference, and the League of Women Voters of North Carolina (the “Proposed Intervenor”) respectfully request that they be permitted to intervene as defendants in this action as of right under Federal Rule of Civil Procedure 24(a) or, in the alternative, permissively under Federal Rule of Civil Procedure 24(b).

Dated: June 17, 2025

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Respectfully submitted,

/s/ Jeffrey Loperfido

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*Counsel for Proposed Intervenor-  
Defendants*

*\*Notice of Special Appearance  
Forthcoming*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document was served on all parties via CM/ECF.

Dated: June 17, 2025

Respectfully submitted,

/s/ Jeffrey Loperfido

Jeffrey Loperfido

Jeffrey Loperfido (N.C. Bar No. 52939)

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