

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

LEAGUE OF WOMEN VOTERS OF )  
 NORTH CAROLINA; A. PHILIP )  
 RANDOLPH INSTITUTE; UNIFOUR )  
 ONESTOP COLLABORATIVE; )  
 COMMON CAUSE NORTH )  
 CAROLINA; GOLDIE WELLS; KAY )  
 BRANDON; OCTAVIA RAINEY; )  
 SARA STOHLER; and HUGH )  
 STOHLER, )

*Plaintiffs,*

v.

THE STATE OF NORTH CAROLINA; )  
 JOSHUA B. HOWARD, in his official )  
 capacity as a member of the State Board )  
 of Elections; RHONDA K. AMOROSO, )  
 in her official capacity as a member of the )  
 State Board of Elections; JOSHUA D. )  
 MALCOLM in his official capacity as a )  
 member of the State Board of Elections; )  
 PAUL J. FOLEY, in his official capacity )  
 as a member of the State Board of )  
 Elections; MAJA KRICKER, in her )  
 official capacity as a member of the State )  
 Board of Elections; and PATRICK L. )  
 MCCRORY, in his official capacity as )  
 the Governor of the State of North )  
 Carolina, )

Civil Action No. 1:13-CV-00660-TDS-JEP

*Defendants.*

**MOTION TO INTERVENE AS PLAINTIFFS BY LOUIS M. DUKE, CHARLES  
M. GRAY, ASGOD BARRANTES, JOSUE E. BERDUO, AND BRIAN M.  
MILLER**

Louis M. Duke, Charles M. Gray, Asgod Barrantes, Josue E. Berduo, and Brian M. Miller (the “Duke Plaintiffs”) seek to participate as intervening plaintiffs in the above-captioned lawsuit challenging the constitutionality of several recent discriminatory and

unduly burdensome changes to North Carolina's election laws set forth in House Bill 589 (2013), also known as the Voter Information Verification Act .

For the reasons discussed in the memorandum in support, filed concurrently herewith, the Duke Plaintiffs are entitled to intervene in this case as a matter of right under Federal Rule of Civil Procedure 24(a)(2). In the alternative, the Duke Plaintiffs request permissive intervention pursuant to Rule 24(b). In accordance with Rule 24(c), a proposed complaint in intervention is attached as Exhibit A.

Counsel for the Duke Plaintiffs have conferred with counsel for the current Plaintiffs, who have stated that they consent to the intervention. Counsel for the Duke Plaintiffs have also contacted the Defendants' counsel but have not yet received a response concerning the Defendants' position.

WHEREFORE, the Duke Plaintiffs pray that the Court grant leave to the Duke Plaintiffs to intervene in the above-captioned matter and to file the proposed complaint that is attached as Exhibit A.

Dated: November 25, 2013

Respectfully submitted,

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*Local Rule 83.1 Attorneys for Proposed  
Plaintiff-Intervenors*

**CERTIFICATE OF SERVICE**

I hereby certify that on this date I served a copy of the foregoing **MOTION** by filing a copy thereof with the Court using the CM/ECF filing system, which will send a copy thereof via e-mail to the following persons:

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This the 25th day of November, 2013.

/s/ Edwin M. Speas, Jr.  
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