

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RAMSEY

SECOND JUDICIAL DISTRICT

Robert LaRose, Teresa Maples, Mary
Sansom, Gary Severson, and Minnesota
Alliance for Retired Americans Educational
Fund,

Case Type: Civil Other/Misc.
Case No. 62-cv-20-3149
Judge Sara Grewing

Plaintiffs,

NOTICE OF INTERVENTION

v.

Steve Simon, in his official capacity as
Minnesota Secretary of State,

Defendant,

Republican Party of Minnesota, Republican
National Committee, and National
Republican Congressional Committee.

Intervenor-Defendants.

TO: Plaintiffs above-named and their counsel, Sybil L. Dunlop and Samuel J. Clark of Green Espel PLLP, 222 S. Ninth Street, Suite 2200, Minneapolis, MN 55402; sdunlop@greeneespel.com, sclark@greeneespel.com, Marc E. Elias and Amanda R. Callais of Perkins Coie LLP, 700 13th St. N.W., Suite 600, Washington, D.C. 20005, MElias@perkinscoie.com, ACallais@perkinscoie.com, Abha Khanna of Perkins Coie LLP, 1201 Third Avenue, Suite 4900, Seattle, WA 98101, AKhanna@perkinscoie.com, and Charles G. Curtis, Jr. of Perkins Coie LLP, 33 East Main Street, Suite 201, Madison, WI 53703, CCurtis@perkinscoie.com.

Defendant above-named and his counsel, Attorney General Keith M. Ellison, Assistant Attorney General Jason Marisam, 445 Minnesota Street, Suite 1400, St. Paul, MN 55101

The Republican Party of Minnesota, Republican National Committee, and National Republican Congressional Committee support and seek to uphold free and fair elections for all Minnesotans and for all voters across the country.

PLEASE TAKE NOTICE, therefore, that the Republican Party of Minnesota, Republican National Committee, and National Republican Congressional Committee (collectively, “Republican Committees” or “Intervenors”), respectively a state committee, the national

committee, and the national congressional committee of the Republican Party, seek to intervene as defendants in the above-captioned matter under Minnesota Rules of Civil Procedure 24.01 and 24.02. This notice of intervention is timely.

The Republican Committees are entitled, under Rule 24.01, to intervene of right in this action. The Republican Committees have made significant contributions and expenditures in support of Republican candidates up and down the ballot in Minnesota for the past many election cycles, and intend to do so again in 2020. They thus have a substantial and particularized interest in defending this action to preserve the structure of the competitive environment in which their supported candidates participate and to ensure that Minnesota carries out free and fair elections. The disposition of this action may as a practical matter impair or impede the Republican Committees' ability to protect that interest. Moreover, the existing parties do not adequately represent the Republican Committees' interests.

Alternatively, the Republican Committees should be granted permissive intervention under Rule 24.02. The Republican Committees' arguments and defenses have questions of fact and law in common with the claims of Plaintiffs. Intervention, moreover, will not unduly delay or prejudice the adjudication of the rights of the existing parties.

As required by Rule 24.03, this notice is accompanied by a pleading, in the form of an answer to Plaintiffs' Complaint, setting forth the reasons for the claim of entitlement to intervention and the nature and extent of the defenses for which intervention is sought.

Please be advised that pursuant to Rule 24.03, in the absence of an objection by one of the existing parties within thirty (30) days after service of this notice, the Republican Committees' intervention will be deemed accomplished. In the event of an objection, as directed under Minn. R. Civ. P. 24.03, the Republican Committees will move the Court for leave to intervene in this

action within thirty (30) days of such objection.

DATED: June 18, 2020

Respectfully submitted,

/s/Benjamin L. Ellison

Benjamin L. Ellison (#392777)

JONES DAY

90 South Seventh Street, Suite 4950

Minneapolis, MN 55402

Phone: (612) 217-8800

Fax: (844) 345-3178

bellison@jonesday.com

John M. Gore *

E. Stewart Crosland *

JONES DAY

51 Louisiana Avenue, N.W.

Washington, D.C. 20001

Phone: (202) 879-3939

Fax: (202) 626-1700

jmgore@jonesday.com

scrosland@jonesday.com

*Counsel for Intervenor-Defendants the
Republican Party of Minnesota, Republican
National Committee, and National
Republican Congressional Committee*

*motion for admission pro hac vice pending