

**UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF PENNSYLVANIA**

Sean Parnell and Luke Negron,  
Plaintiffs,

v.

Allegheny County Board of Elections; Rich Fitzgerald, in his official capacity as a member of the Allegheny County Board of Elections; Samuel DeMarco III, in his official capacity as a member of the Allegheny County Board of Elections; and Bethany Hallam, in her official capacity as a member of the Allegheny County Board of Elections,

Defendants.

No. 20-cv-1905

**PROPOSED INTERVENORS-DEFENDANTS' MOTION TO INTERVENE**

Proposed Intervenor-Defendants DCCC and Congressman Conor Lamb move for leave to participate in this action to defend their interests against the claims asserted by Plaintiffs. For the reasons discussed in the memorandum in support, Proposed Intervenor-Defendants are entitled to intervene in this case as a matter of right under Federal Rule of Civil Procedure 24(a)(2). In the alternative, Proposed Intervenor-Defendants request permissive intervention pursuant to Rule 24(b). In accordance with Rule 24(c), a proposed answer to Plaintiffs' complaint is attached as Exhibit A and a proposed opposition to Plaintiffs' motion for injunctive relief is attached as Exhibit B.

WHEREFORE, Proposed Intervenor-Defendants request that the court grant them leave to intervene in the above-captioned matter.

Dated: October 22, 2020.

Respectfully submitted,

/s/ \_\_\_\_\_

Justin T. Romano  
PA ID No. 307879  
justin@arlawpitt.com  
Marco S. Attisano  
PA ID No. 316736  
marco@arlawpitt.com  
429 Fourth Avenue, Suite 1705  
Pittsburgh, PA 15219  
Phone: (412) 336-8622  
Fax: (412) 336-8629

Marc E. Elias\*  
Uzoma Nkwonta\*  
Stephanie Command\*  
Courtney Elgart\*  
Jacob D. Shelly\*  
PERKINS COIE LLP  
700 Thirteenth St., N.W., Suite 600  
Washington, D.C. 20005-3960  
Telephone: (202) 654-6200  
Facsimile: (202) 654-9959  
melias@perkinscoie.com  
unkwonta@perkinscoie.com  
scommand@perkinscoie.com  
celgart@perkinscoie.com  
jshelly@perkinscoie.com

*Counsel for Proposed Intervenors*

*\*Motions for Admission Pro Hac Vice  
Forthcoming*

**CERTIFICATE OF SERVICE**

I hereby certify that on Thursday, October 22, 2020, on I filed a copy of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/  
Counsel for Proposed Intervenors