

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

ROY L. PERRY-BEY, CARLOS A.)	
HOWARD,)	
)	
Plaintiffs,)	
)	
vs.)	Case No. 1:23-cv-01165-LMB-IDD
)	
)	
Virginia State Board of Elections, Virginia)	
Department of Elections, and DONALD)	
JOHN TRUMP,)	
)	
Defendants,)	
And,)	
)	
REPUBLICAN PARTY OF VIRGINIA,)	
Inc.)	
)	
Intervenor.)	

**REPUBLICAN PARTY OF VIRGINIA’S MOTION TO INTERVENE
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 24**

Intervenor, the Republican Party of Virginia, respectfully moves to intervene as a defendant in this action pursuant to Federal Rule of Civil Procedure 24, and requests the Court accept its proposed Complaint in Intervention, attached hereto.

Counsel for Intervenor attempted to confer with pro se Plaintiffs, who did not respond to Counsel’s multiple emails. Counsel for the State and Counsel for Defendant President Trump has consented to the Republican Party of Virginia’s intervention.

For the reasons stated in the attached Memorandum of Law in support of this Motion, Intervenor requests that this Court grant this motion and allow the Republican Party of Virginia to intervene as of right, or alternatively, via permissive intervention, to

represent its interests in this action.

WHEREFORE, Intervenor respectfully requests that the Court grant this motion and allow the Republican Party of Virginia to intervene, file its proposed Complaint in Intervention, and defend its interests in this action.

Dated: November 7, 2023

Respectfully submitted,

JAY ALAN SEKULOW**

[REDACTED]

JORDAN SEKULOW**

[REDACTED]

STUART J. ROTH**

[REDACTED]

ANDREW J. EKONOMOU**

[REDACTED]

MATTHEW R. CLARK**

[REDACTED]

/s/ Colby M. May

COLBY M. MAY

[REDACTED]

BENJAMIN P. SISNEY*

[REDACTED]

NATHAN MOELKER*

[REDACTED]

AMERICAN CENTER

FOR LAW AND JUSTICE

[REDACTED]


Counsel for Intervenor

*Admitted in this jurisdiction, application for admission to practice before this Court pending.

**Not admitted in this jurisdiction; motion for pro hac vice admission forthcoming.

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of November, 2023, the foregoing document was electronically transmitted to the Clerk of Court using the ECF System for filing and was transmitted to those individuals receiving Notice of Electronic Filings in this matter.

/s/ Colby M. May
COLBY M. MAY (VA Bar No.
19734)
AMERICAN CENTER FOR LAW & JUSTICE

Counsel for Intervenor