

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN**

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LISA HUNTER, JACOB ZABEL, JENNIFER  
OH, JOHN PERSA, GERALDINE SCHERTZ,  
and KATHLEEN QUALHEIM,

Plaintiffs,

v.

Case No. 3:21-cv-00512

MARGE BOSTELMANN, JULIE M. GLANCEY,  
ANN S. JACOBS, DEAN KNUDSON, ROBERT F.  
SPINDELL, JR., and MARK L. THOMSEN, in  
their official capacities as members of the Wisconsin  
Elections Commission,

Defendants.

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**MOTION TO INTERVENE AS PLAINTIFFS**

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PLEASE TAKE NOTICE that Proposed Intervenor-Plaintiffs, Billie Johnson, Eric O'Keefe, Ed Perkins, and Ronald Zahn timely move this Court pursuant to Rule 24 of the Federal Rules of Civil Procedure for leave to intervene as Plaintiffs in the above-captioned case.

Proposed Intervenor-Plaintiffs are Wisconsin voters whose constitutional rights are jeopardized by this lawsuit, and existing parties do not adequately represent their interests in the case. *See* Fed. R. Civ. P. 24(a)(2). Further, their claims share with the main action a common question of law and their intervention will not unduly delay or prejudice the adjudication of the original parties' rights. *See* Fed. R. Civ. P. 24(b)(1), (3).

This Court should therefore authorize Proposed Intervenor-Plaintiffs to intervene as of right pursuant to Fed. R. Civ. P. 24(a), or, alternately, should authorize permissive intervention pursuant to Fed. R. Civ. P. 24(b).

The basis for this Motion to Intervene as Plaintiff is set forth in the accompanying Memorandum of Law in Support of Motion to Intervene as Plaintiffs. Also accompanying the motion is a Proposed Complaint (Exhibit A), a Motion to Stay Proceedings (Exhibit B), a Memorandum of Law in Support of Motion to Stay Proceedings (Exhibit C), and an Original Action Petition (Exhibit D).

Dated this 26th day of August, 2021.

Respectfully submitted,

WISCONSIN INSTITUTE FOR LAW & LIBERTY  
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