

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF KENTUCKY**

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

MICHAEL ADAMS, in his Official Capacity as KENTUCKY SECRETARY OF STATE and as CHIEF ELECTION OFFICIAL for the KENTUCKY STATE BOARD OF ELECTIONS; ROSS OWENS, III in his Official Capacity as KENTUCKY STATE BOARD OF ELECTIONS MEMBER; ERIC FARRIS in his Official Capacity as KENTUCKY STATE BOARD OF ELECTIONS MEMBER; JOHN BROWN, III in his Official Capacity as KENTUCKY STATE BOARD OF ELECTIONS MEMBER; SUE PERRY in her Official Capacity as KENTUCKY STATE BOARD OF ELECTIONS MEMBER; DEANNA BRANGERS in her Official Capacity as KENTUCKY STATE BOARD OF ELECTIONS MEMBER; CORY SKOLNICK in his Official Capacity as KENTUCKY STATE BOARD OF ELECTIONS MEMBER; DWIGHT SEARS in his Official Capacity as KENTUCKY STATE BOARD OF ELECTIONS MEMBER; JULIE GRIGGS in her Official Capacity as KENTUCKY STATE BOARD OF ELECTIONS MEMBER,

*Defendants.*

Case No.: 3:26-cv-00019-GFVT

**MOTION OF THE LEAGUE OF WOMEN VOTERS OF  
KENTUCKY, THE NEW AMERICANS INITIATIVE, ZITSI  
MIRAKHUR, AND JOERN SOLTAU TO INTERVENE AS  
DEFENDANTS**

The League of Women Voters of Kentucky, the New Americans Initiative, Zitsi Mirakhur, and Joern Soltau (collectively, “Proposed Intervenors”) move to intervene as Defendants pursuant to Rule 24(a) of the Federal Rules of Civil Procedure or, in the alternative, pursuant to Rule 24(b).

Proposed Intervenors are non-partisan public interest organizations dedicated to democracy and civic life in Kentucky and two individual, registered Kentucky voters. As set forth more fully in the memorandum of law filed concurrently with this Motion, Proposed Intervenors are entitled to intervention as of right because their motion is timely, they and their members have unique, protectable interests in the subject matter of the lawsuit which will be threatened by the relief sought by Plaintiff the United States, and their interests may not be adequately represented by the existing Defendants. Permissive intervention may also be granted because the motion is timely and Proposed Intervenors’ participation will aid in the development of the record and the resolution of the case.

Declarations supporting the Motion are filed concurrently herewith, as attachments to the Motion. A proposed order granting the Motion is attached to this Motion as Exhibit H. A proposed motion to dismiss is attached to this Motion as Exhibit F, by way of a response to the United States’ Complaint. *See* Fed. R. Civ. P. 24(c). A proposed order to the proposed motion to dismiss is also attached as Exhibit G.

Proposed Intervenors reserve the right to supplement their response to the Complaint within the time allowed for response by Rule 12 after intervention is granted. Proposed Intervenors have conferred with Plaintiff the United States, which explained it was unable to state a position at this time, but would be able to do so within a week of this filing.

### **CONCLUSION**

The Court should grant the Motion to Intervene as Defendants as of right, or in the alternative, via permissive intervention.

Dated: March 6, 2026

Respectfully submitted,

/s/ Corey Shapiro  
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*\* application for admission pro hac vice  
forthcoming*

**CERTIFICATE OF SERVICE**

I hereby certify I served this document and all attachments, on all counsel of record via the Court's CM/ECF system on this 6th day of March, 2026.

*//s/ Corey M. Shapiro*  
Corey M. Shapiro  
ACLU of Kentucky Foundation

*Counsel for Proposed Intervenors*