

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
21 CVS 015426

NORTH CAROLINA LEAGUE OF
CONSERVATION VOTERS, INC.;
HENRY M. MICHAUX, JR., et al.,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in
his official capacity as Chair of the House
Standing Committee on Redistricting, et al.,

Defendants.

RESPONSE TO
MOTION TO INTERVENE

Pursuant to this Court's Order dated December 13, 2021, the NCLCV Plaintiffs provide their response to the Motion to Intervene as Plaintiffs and to Expedite Consideration of Same filed by Proposed Intervenor Common Cause.

The NCLCV Plaintiffs take no position on the intervention motion. If intervention is permitted, however, it must not affect any of the deadlines, time allocations, or other rights already granted to the existing Plaintiffs by the Court's December 13 Case Scheduling Order, including but not limited to the Court's Order granting the existing Plaintiffs collectively 9 hours to present their direct evidence and conduct any cross-examination and the Court's Order granting the existing Plaintiffs collectively one hour of closing argument.

Dated: December 14, 2021

Respectfully submitted,

JENNER & BLOCK LLP

ROBINSON, BRADSHAW & HINSON, P.A.

Sam Hirsch*
Jessica Ring Amunson*
Kali Bracey*
Zachary C. Schauf*
Karthik P. Reddy*
Urja Mittal*
JENNER & BLOCK LLP
1099 New York Avenue NW, Suite 900
Washington, D.C. 20001
(202) 639-6000
shirsch@jenner.com
zschauf@jenner.com

* *Admitted pro hac vice*

/s/ Stephen D. Feldman

Stephen D. Feldman
North Carolina Bar No. 34940
ROBINSON, BRADSHAW & HINSON, P.A.
434 Fayetteville Street, Suite 1600
Raleigh, NC 27601
(919) 239-2600
sfeldman@robinsonbradshaw.com

Adam K. Doerr
North Carolina Bar No. 37807
ROBINSON, BRADSHAW & HINSON, P.A.
101 North Tryon Street, Suite 1900
Charlotte, NC 28246
(704) 377-2536
adoerr@robinsonbradshaw.com

Erik R. Zimmerman
North Carolina Bar No. 50247
ROBINSON, BRADSHAW & HINSON, P.A.
1450 Raleigh Road, Suite 100
Chapel Hill, NC 27517
(919) 328-8800
ezimmerman@robinsonbradshaw.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Response was served upon each of the parties to this action by electronic mail to counsel at the e-mail addresses indicated below, in accordance with North Carolina Rule of Civil Procedure 5(b)(1)(a):

Burton Craige
Narendra K. Ghosh
Paul E. Smith
PATTERSON HARKAVY LLP
100 Europa Drive, Suite 420
Chapel Hill, NC 27517
bcraig@pathlaw.com
nghosh@pathlaw.com
psmith@pathlaw.com

Lalitha D. Madduri
Jacob D. Shelly
Graham W. White
ELIAS LAW GROUP LLP
10 G Street NE, Suite 600
Washington, DC 20002
lmadduri@elias.law
jshelly@elias.law
gwhite@elias.law

Abha Khanna
ELIAS LAW GROUP LLP
1700 Seventh Avenue, Suite 2100
Seattle, WA 98101
akhanna@elias.law

Elisabeth S. Theodore
R. Stanton Jones
Samuel F. Callahan
ARNOLD AND PORTER KAYE SCHOLER LLP
601 Massachusetts Avenue NW
Washington, DC 20001-3743
elisabeth.theodore@arnoldporter.com
stanton.jones@arnoldporter.com
samuel.callahan@arnoldporter.com

*Counsel for Petitioners Rebecca Harper,
et al.*

Phillip J. Strach
Thomas A. Farr
John E. Branch III
Alyssa M. Riggins
NELSON MULLINS RILEY & SCARBOROUGH LLP
4140 Parklake Avenue, Suite 200
Raleigh, NC 27612
phillip.strach@nelsonmullins.com
tom.farr@nelsonmullins.com
john.branch@nelsonmullins.com
alyssa.riggins@nelsonmullins.com

Mark E. Braden
Katherine McKnight
Richard Raile
BAKER HOSTETLER LLP
1050 Connecticut Avenue NW,
Suite 1100
Washington, DC 20036
mbraden@bakerlaw.com
kmcknight@bakerlaw.com
rraile@bakerlaw.com

*Counsel for Respondents Representative Destin
Hall, Senator Warren Daniel, Senator Ralph E.
Hise, Jr., Senator Paul Newton, Representative
Timothy K. Moore, and Senator Phillip E.
Berger*

Terence Steed
Stephanie Brennan
Amar Majmundar
N.C. DEPARTMENT OF JUSTICE
Post Office Box 629
Raleigh, NC 27502-0629
tsteed@ncdoj.gov
sbrennan@ncdoj.gov
amajmundar@ncdoj.gov

Allison J. Riggs
Hilary H. Klein
Mitchell Brown
Katelin Kaiser
Jeffrey Loperfido
SOUTHERN COALITION FOR SOCIAL JUSTICE
1415 W. Highway 54, Suite 101
Durham, NC 27707
allison@southerncoalition.org
hilaryhklein@scsj.org
mitchellbrown@scsj.org
katelin@scsj.org
jeffloperfido@scsj.org

J. Tom Boer*
Olivia T. Molodanof*
HOGAN LOVELLS US LLP
3 Embarcadero Center, Suite 1500
San Francisco, CA 94111
tom.boer@hoganlovells.com
oliviamolodanof@hoganlovells.com

**Pro hac vice motion filed*

*Counsel for Proposed Intervenor Common
Cause*

This 14th day of December, 2021.

*Counsel for Respondents the North Carolina
State Board of Elections, Damon Circosta,
Stella Anderson, Jeff Carmon III, Stacy Eggers
IV, Tommy Tucker, Karen Brinson Bell; and the
State of North Carolina*

/s/ Stephen Feldman
Stephen Feldman