IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WISCONSIN

PUBLIC INTEREST LEGAL FOUNDATION, INC.,

Plaintiff,

Civil Action No. 24-cv-285-jdp

v.

MEAGAN WOLFE, in her official capacity as Administrator of the Wisconsin Elections Commission,

Defendant.

<u>UNITED STATES' NOTICE OF INTERVENTION</u> PURSUANT TO 28 U.S.C. § 2403(a)

Pursuant to 28 U.S.C. § 2403(a) and in response to Plaintiffs' Notice of Constitutional Question, ECF No. 17, the United States hereby respectfully notifies the Court that it exercises its right to intervene in this proceeding to defend the constitutionality of Section 4(b) of the National Voter Registration Act of 1993, 52 U.S.C. § 20503(b). Unless otherwise directed by the Court, the United States expects to submit a brief regarding the constitutionality of Section 4(b) on or before September 16, 2024.

Date: August 26, 2024

TIMOTHY M. O'SHEA United States Attorney Western District of Wisconsin

/s/ Barbara L. Oswald LESLIE K. HERJE BARBARA L. OSWALD Assistant U.S. Attorneys United States Attorney's Office Western District of Wisconsin 222 W. Washington Ave, Suite 700 Madison, WI 53703

Phone: (608) 264-5158 barbara.oswald@usdoj.gov KRISTEN CLARKE **Assistant Attorney General**

SPARKLE SOOKNANAN Principal Deputy Assistant Attorney General Civil Rights Division

/s/ Rachel R. Evans R. TAMAR HAGLER RICHARD DELLHEIM RACHEL R. EVANS JUDY J. BAO Attorneys, Voting Section Civil Rights Division U.S. Department of Justice 950 Pennsylvania Ave. NW Washington, D.C. 20530 Phone: (800) 253-3931

Fax: (202) 307-3961 rachel.evans@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on August 26, 2024, I electronically filed the foregoing with the Clerk of the court using the CM/ECF system, which will send notification of this filing to counsel of record.

/s/ Rachel R. Evans
Rachel R. Evans
Civil Rights Division
U.S. Department of Justice
950 Pennsylvania Ave, NW
Washington, DC 20530
(202) 598-9924
rachel.evans@usdoj.gov