

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

VIRGINIA VOTER’S ALLIANCE and)
 DAVID NORCROSS,)
)
 Plaintiffs,)
)
 v.)
)
 ANNA J. LEIDER, in her official capacity)
 as General Registrar for the)
 City of Alexandria,)
)
 Defendant.)

No. 16-394-LMB/MSN

**MOTION OF THE LEAGUE OF WOMEN VOTERS OF VIRGINIA
TO INTERVENE**

Pursuant to Federal Rule of Civil Procedure 24, the League of Women Voters of Virginia (the “League”) respectfully submits this motion, by and through undersigned counsel, to intervene in the above-captioned case as of right or, in the alternative, with the Court’s permission.

As set forth in its accompanying brief in support of its motion to intervene, and its League of Women Voters of Virginia Brief in Support of Motion to Dismiss Count I (hereby lodged with the Court), the League seeks to dismiss Count I of the Complaint and opposes any requested court-ordered purging of voting rolls in the City of Alexandria. For the reasons stated in those papers, no such court-ordered “list maintenance” is appropriate under—much less

required by—the National Voter Registration Act (“NVRA”), a federal statute designed to make it *easier* for voters to obtain and maintain their registration to vote.

The League requests that the Court accept as properly filed its League of Women Voters of Virginia Brief in Support of Motion to Dismiss Count I, and further requests the opportunity to participate in the argument before the Court on the Registrar’s motion to dismiss on June 17, 2016. Should the Court properly dismiss Count I of the Complaint for failure to state a claim for relief under the NVRA, the League would no longer seek to participate in the case, unless Plaintiffs were to file an amended complaint again seeking to compel the Registrar to purge voter registrations or if Plaintiffs appealed the dismissal of Count I.

The grounds for the League’s motion are addressed in the accompanying brief.

Respectfully submitted,

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Dated: June 10, 2016

CERTIFICATE OF SERVICE

I certify that on the 10th day of June, 2016 the foregoing was filed via the Court's CM/ECF filing system which will send a notification of filing to the following counsel of record:

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