SPCV20-00982-BA

e-Filed in Office Tammie Mosley Clerk of Superior Court Chatham County Date: 11/5/2020 9:43 AM Reviewer: LS

IN THE SUPERIOR COURT OF CHATHAM COUNTY STATE OF GEORGIA

IN RE: ENFORCEMENT OF ELECTION LAWS AND SECURING BALLOTS CAST OR RECEIVED AFTER 7:00 P.M. ON NOVEMBER 3, 2020,

Civil Action No. SPCV20-00982

MOTION TO INTERVENE AS RESPONDENT

The Democratic Party of Georgia ("DPG") seeks to participate as an intervening respondent in the above-captioned petition to defend its interests in protecting Georgia voters who cast ballots in the November 3, 2020 general election.

For the reasons discussed in the memorandum in support, filed concurrently herewith, DPG is entitled to intervene in this case as a matter of right under O.C.G.A. § 9-11-24(a). In the alternative, DPG requests permissive intervention pursuant to O.C.G.A. § 9-11-24(b). In accordance with O.C.G.A. § 9-11-24(c), DPG's Proposed Answer to the Petition to Command Enforcement of Election Laws is attached as Exhibit C.

WHEREFORE, DPG respectfully requests that the Court grant it leave to intervene in the above-captioned matter and to participate as an intervenor in the November 5, 2020 hearing.

Respectfully submitted, this 5th day of November 2020.

By: /s/ Jeffrey R. Harris_

JEFFREY R. HARRIS Georgia Bar No. 330315 jeff@hlmlawfirm.com

Harris Lowry Manton LLP

410 E. Broughton St. Savannah, GA 31401 Phone: (912) 651-9967 Facsimile: (912) 651-1276

MANOJ S. VARGHESE
Georgia Bar No. 734668
varghese@bmelaw.com
CHRISTOPHER T. GIOVINAZZO
Georgia Bar No. 142165
MICHAEL B. TERRY
Georgia Bar No. 702582
BENJAMIN E. FOX
Georgia Bar No. 329427
fox@bmelaw.com

Bondurant, Mixson & Elmore, Llp 3900 One Atlantic Center 1201 W. Peachtree Street, NW Atlanta, Georgia 30309 T: (404) 881-4100 F: (404) 881-4111

Marc E. Elias*

Amanda R. Callais*

Perkins Coie LLP

700 Thirteenth Street, N.W., Suite 600
Washington, D.C. 20005-3960
Telephone: (202) 654-6200
Facsimile: (202) 654-6211
ACallais@perkinscoie.com
*pro hac vice applications pending

Attorneys for Proposed Intervenor-Respondent The Democratic Party of Georgia, Inc.

CERTIFICATE OF SERVICE

I the undersigned certify that the foregoing has been served via electronic mail and by filing it with the Odyssey electronic filing system which will send notification of such filing to counsel of record.

Respectfully submitted, this 5th day of November 2020.

By: /s/ Jeffrey R. Harris JEFFREY R. HARRIS Georgia Bar No. 330315 jeff@hlmlawfirm.com

Harris Lowry Manton LLP 410 E. Broughton St. Savannah, GA 31401 Phone: (912) 651-9967

Facsimile: (912) 651-1276