

IN THE SUPREME COURT OF THE UNITED STATES

REPUBLICAN PARTY OF PENNSYLVANIA,
Petitioner,

v.

KATHY BOOCKVAR, IN HER OFFICIAL CAPACITY AS PENNSYLVANIA
SECRETARY OF STATE, ET AL.,
Respondents.

JOSEPH B. SCARNATTI, III, ET AL.,
Petitioners,

v.

PENNSYLVANIA DEMOCRATIC PARTY, ET AL.,
Respondents.

**On Petitions For Writs Of Certiorari To The
Pennsylvania Supreme Court**

**MOTION OF THOMAS J. RANDOLPH AND C.F. CANAVAN
FOR LEAVE TO INTERVENE AS RESPONDENTS**

**Respectfully submitted,
Helen Randolph,
Counsel of Record
P.O. Box 17416
2043 Wilson Boulevard
Arlington, Virginia 22216
302-907-9831
hrlaw302907@gmail.com
Counsel for Intervenor/Applicants
Randolph/Canavan**

MOTION FOR LEAVE TO INTERVENE AS RESPONDENTS

Thomas J. Randolph and C. F. Canavan, by counsel, hereby move for leave to intervene as respondents as permissive intervenors under Federal Rules of Civil Procedure Rule 24(b), which permits intervention on timely motion by anyone who “has a claim or defense that shares with the main action a common question of law or fact,” and state as follows in support of the motion:

1. Thomas J. Randolph is a resident of Pennsylvania and a voter. He has voted in Pennsylvania elections in previous years, voted absentee this year, and intends to vote in future elections.
2. C.F. Canavan is a resident of Virginia and a voter. He has voted in Virginia elections in previous years, voted this year, and intends to vote in future elections.
3. The movants assert a claim to a right to vote on Election Day, even if voting absentee.
4. They assert associational interests with voters of other states and in the ability of those voters to vote on Election Day, rather than before, even if voting absentee.
5. Movants assert that it is unconstitutional to require voters to vote before Election Day and that the state legislature does not have the authority to make such laws.
6. These claims and defenses are share with the main action common questions of law and fact which have not yet been adequately raised on behalf of the voters in this litigation
7. This motion is timely as Movants are submitting a proposed Opposition to the Petitions for Writ of Certiorari herewith, on the day they are due.
8. No party would be prejudiced by the entry of Movants as Respondents.

Respectfully submitted,

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