

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

STATE OF MISSOURI, DAVID MASON,
ANDREA MCCANN, JESSICA FISHER, and
PHILLIP FISHER,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
COMMERCE, HOWARD W. LUTNICK in his
official capacity as Secretary of Commerce,
UNITED STATES CENSUS BUREAU, and
GEORGE COOK in his official capacity as Acting
Director of the U.S. Census Bureau,

Defendants.

Case No. 4:26-cv-00131 (JAR)

**MOTION TO INTERVENE AS DEFENDANTS BY
NAACP, MISSOURI NAACP, SIREN, MIRA, H. VICTORIA MORGAN, GABE REISS,
CARRIE NICOLAS, LUCIA ORNELAS, AND VERONICA ZAVALA**

National Association for the Advancement of Colored People (“NAACP”), National Association for the Advancement of Colored People Missouri State Conference (“Missouri NAACP”), Services, Immigrant Rights, and Education Network (“SIREN”), Massachusetts Immigrant and Refugee Advocacy Coalition (“MIRA”), H. Victoria Morgan, Gabe Reiss, Carrie Nicolas, Lucia Ornelas, and Veronica Zavala (collectively “Proposed Intervenors”) move to intervene in this matter as Defendants to defend their significant interests that stand to be impaired by this litigation. For the reasons discussed in the supporting memorandum filed alongside this motion, Proposed Intervenors are entitled to intervene in this case as a matter of right under Federal Rule of Civil Procedure 24(a)(2). In the alternative, Proposed Intervenors request permissive intervention under Rule 24(b). Pursuant to Rule 24(c), a Proposed Answer is also attached to this

Motion.¹

WHEREFORE, Proposed Intervenors respectfully request that the Court grant their motion to intervene.

Dated: February 27, 2026

Respectfully submitted,

/s/ J. Andrew Hirth
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**Pro hac vice applications forthcoming*

Counsel for Proposed Intervenors

¹ Proposed Intervenors respectfully request leave to file a Rule 12(b) motion within the time period prescribed by the Federal Rules of Civil Procedure or pursuant to any schedule set by this Court.

Exhibit 1

**UNITED STATES DISTRICT COURT
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STATE OF MISSOURI, DAVID MASON,
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UNITED STATES DEPARTMENT OF
COMMERCE, HOWARD W. LUTNICK in his
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GEORGE COOK in his official capacity as Acting
Director of the U.S. Census Bureau,

Defendants.

Case No. 4:26-cv-00131 (JAR)

**[PROPOSED] ANSWER TO PLAINTIFFS' COMPLAINT FOR DECLARATORY AND
INJUNCTIVE RELIEF**

Proposed Intervenors National Association for the Advancement of Colored People (“NAACP”), National Association for the Advancement of Colored People Missouri State Conference (“Missouri NAACP”), Services, Immigrant Rights, and Education Network (“SIREN”), Massachusetts Immigrant and Refugee Advocacy Coalition (“MIRA”), H. Victoria Morgan, Gabe Reiss, Carrie Nicolas, Lucia Ornelas, and Veronica Zavala, pursuant to Fed. R. Civ. P. 24(c), hereby submit this proposed answer to Plaintiff’s Complaint for Declaratory and Injunctive Relief (ECF No. 1), as follows:

INTRODUCTION

1. Paragraph 1 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenors admit

the cited sources contain the quoted text. The sources otherwise speak for themselves.

2. Paragraph 2 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits the cited sources contain the quoted text. The sources otherwise speak for themselves.

3. Paragraph 3 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor denies the allegations.

4. Proposed Intervenor denies that the federal government has only counted undocumented immigrants in the Census and included them in apportionment counts “[s]ince the Carter Administration.” Proposed Intervenor admits the cited sources contain the quoted text.

5. Paragraph 5 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits the cited source contains the quoted text, and otherwise denies the allegations.

6. Paragraph 6 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits the cited sources contain the quoted text but otherwise denies the allegations.

7. Proposed Intervenor admits that the 2020 Census did not count foreigners visiting the United States for vacation on Census day but otherwise lacks sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in Paragraph 7 and therefore denies them.

8. Paragraph 8 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits the cited sources contain the quoted text but otherwise denies the allegations.

9. Paragraph 9 contains legal contentions, characterizations, conclusions, and opinions to

which no response is required. To the extent a response is required, Proposed Intervenor admits the cited sources contain the quoted text but otherwise deny the allegations.

10. Paragraph 10 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits the cited sources contain the quoted text but otherwise deny the allegations in Paragraph 10.

11. Paragraph 11 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits the cited sources contain the quoted text but otherwise deny the allegations in Paragraph 11.

12. Paragraph 12 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits the cited sources contain the quoted text but otherwise deny the allegations in Paragraph 12.

13. Paragraph 13 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits the cited sources contain the quoted text and admit that 2 million is “roughly” one third of 6.15 million but otherwise deny the allegations in Paragraph 13.

14. Paragraph 14 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits the cited sources contain the quoted text but otherwise deny the allegations in Paragraph 14.

15. Proposed Intervenor lacks sufficient knowledge and information to form a belief as to the truth or falsity of the Plaintiffs’ allegations in Paragraph 15 that Missouri would have gained a congressional seat in 2020 and 2030 if only citizens and legal permanent residents were counted and therefore deny them. Proposed Intervenor otherwise deny the allegations in Paragraph 15.

16. Paragraph 16 contains legal contentions, characterizations, conclusions, and opinions

to which no response is required. To the extent a response is required, Proposed Intervenors admit the cited source contains the quoted text but otherwise deny the allegations in Paragraph 16.

17. Proposed Intervenors lack sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in Paragraph 17 and therefore deny them. Plaintiffs admit that the cited source contains the quoted text.

18. Paragraph 18 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenors deny the allegations in Paragraph 18.

19. Paragraph 19 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenors admit the cited sources contain the quoted text and admit that “temporary visa holders . . . cannot vote” but otherwise deny the allegations in Paragraph 19.

20. Paragraph 20 does not contain any substantive allegations.

PARTIES

21. Proposed Intervenors admit that Missouri is a state. Paragraph 21 otherwise contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenors deny the allegations in Paragraph 21.

22. Proposed Intervenors lack sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in Paragraph 22 and therefore deny them.

23. Proposed Intervenors lack sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in Paragraph 23 and therefore deny them.

24. Proposed Intervenors lack sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in Paragraph 24 and therefore deny them.

25. Paragraph 25 does not contain any substantive allegations.

26. Proposed Intervenors admit that the United States Department of Commerce is a cabinet agency with certain responsibilities for planning, designing, and implementing the decennial Census. Proposed Intervenors admit the cited sources contain the quoted text. Those sources speak for themselves.

27. Proposed Intervenors admit that Howard W. Lutnick is the Secretary of Commerce, that he is sued in his official capacity, and that the Secretary of Commerce has involvement in the decennial Census and apportionment. Paragraph 27 otherwise contains legal contentions, characterizations, conclusions, and opinions to which no response is required.

28. Proposed Intervenors admit the allegations in Paragraph 28.

29. Proposed Intervenors deny the allegation in Paragraph 29 that George Cook is the Acting Director of the Census Bureau but admit that he is sued in his official capacity.

JURISDICTION, VENUE, AND THREE-JUDGE PANEL

30. Paragraph 30 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenors deny the allegations in Paragraph 30.

31. Paragraph 31 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenors deny the allegations in Paragraph 31.

32. Paragraph 32 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenors deny the allegations in Paragraph 32.

33. Proposed Intervenors deny the allegations in Paragraph 33.

34. Proposed Intervenors deny the allegations in Paragraph 34.

35. Paragraph 35 contains legal contentions, characterizations, conclusions, and opinions

to which no response is required. To the extent a response is required, Proposed Intervenor admits that the cited statute contains the quoted text but deny that a three-judge court is required in this case under 28 U.S.C. § 2284(a).

36. Paragraph 36 contains legal contentions, characterizations, conclusions, opinions, and a request to which no response is required. To the extent a response is required, Proposed Intervenor admits the cited source contains the quoted text and admit that Plaintiffs request the notification that they request, but deny that such a notification is warranted because 28 U.S.C. § 2284(a) does not require a three-judge court in this case.

FACTS COMMON TO ALL COUNTS

37. Preceding Paragraph 37 is a header to which no response is required. To an extent a response is required, Proposed Intervenor deny the allegation in the header. Paragraph 37 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admit that the cited source contains the quoted text but otherwise deny the allegations in Paragraph 37.

38. Paragraph 38 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admit the cited sources contain the quoted text.

39. Paragraph 39 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admit the allegations in Paragraph 39.

40. Proposed Intervenor lack sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in Paragraph 40 and therefore deny them. To the extent a response is required, Proposed Intervenor admit the cited source contains the quoted text.

41. Paragraph 41 contains legal contentions, characterizations, conclusions, and opinions

to which no response is required. To the extent a response is required, Proposed Intervenors admit the cited sources contain the quoted text.

42. Proposed Intervenors admit the allegations in Paragraph 42.

43. Paragraph 43 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenors admit the cited sources contain the quoted text but otherwise deny the allegations in Paragraph 43.

44. Paragraph 44 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenors admit the cited sources contain the quoted text but otherwise deny the allegations in Paragraph 44.

45. Preceding Paragraph 45 is a header to which no response is required. To an extent a response is required, Proposed Intervenors deny the allegation in the header. Paragraph 45 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenors admit the cited sources contain the quoted text but otherwise deny the allegations in Paragraph 45.

46. Paragraph 46 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenors admit the cited sources contain the quoted text but otherwise deny the allegations in Paragraph 46.

47. Proposed Intervenors lack sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in Paragraph 47 and therefore deny them.

48. Proposed Intervenors lack sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in Paragraph 48 and therefore deny them. Plaintiffs admit that the cited source contains the quoted text.

49. Proposed Intervenors lack sufficient knowledge and information to form a belief as to

the truth or falsity of the allegations in Paragraph 49 and therefore deny them. Plaintiffs admit that the cited source contains the quoted text.

50. Paragraph 50 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenors admit the cited sources contain the quoted text, except that Proposed Intervenors do not have access to the cited Testimony of Director Keane. Proposed Intervenors otherwise deny the allegations in Paragraph 50.

51. Paragraph 51 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenors admit the cited sources contain the quoted text but otherwise deny the allegations in Paragraph 51.

52. Paragraph 52 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenors admit the cited sources contain the quoted text, except that Proposed Intervenors do not have access to the cited Testimony of Director Keane. Proposed Intervenors otherwise deny the allegations in Paragraph 52.

53. Paragraph 53 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenors admit that the cited bills were introduced, that the Senate passed two amendments, and that these measures did not become law. Proposed Intervenors otherwise deny the allegations in Paragraph 53.

54. Paragraph 54 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenors admit the cited source contains the quoted text but otherwise deny the allegations in Paragraph 54.

55. Paragraph 55 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits that the amendment excluding undocumented immigrants passed in the Senate but was not included in the House version of the bill and did not become law. Proposed Intervenor otherwise denies the allegations in Paragraph 55.

56. Paragraph 56 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits that the 1990, 2000, 2010 and 2020 Censuses counted undocumented immigrants. Proposed Intervenor otherwise denies the allegations in Paragraph 56.

57. Paragraph 57 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor denies the allegations in Paragraph 57.

58. Paragraph 58 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits that the cited source contains the quoted text.

59. Paragraph 59 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits that the Trump Administration decided to include undocumented immigrants in the 2020 Census, that it tried to include a citizenship question on the 2020 Census, and that the Supreme Court struck the question. Proposed Intervenor otherwise denies the allegations in Paragraph 59.

60. Paragraph 60 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits that President Trump issued the cited executive order. The executive order speaks for itself.

61. Proposed Intervenors admit that President Trump issued the cited memorandum. The memorandum speaks for itself.

62. Paragraph 62 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenors admit that states sued to enjoin the implementation of the memorandum, that nationwide injunctions were issued against the policy, and the Supreme Court later vacated these injunctions.

63. Paragraph 63 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenors lack sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in Paragraph 63 and therefore deny them

64. Paragraph 64 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenors admit that President Biden issued the cited executive order, and that the Secretary of Commerce transmitted an apportionment tabulation to the President on April 26, 2021 that included undocumented immigrants and temporary visa holders in the apportionment base. Proposed Intervenors admit that the map accurately reflects the apportionment tabulation.

65. Paragraph 65 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenors lack sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in Paragraph 65 and therefore deny them.

66. Paragraph 66 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenors deny that Missouri has Article III standing to challenge the legality of the 2020 Census and 2021

Apportionment.

67. Paragraph 67 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor deny that the Individual Plaintiffs have Article III standing to challenge the legality of the 2020 Census and 2021 Apportionment.

68. Paragraph 68 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admit that the cited source contains the quoted text and deny that Plaintiffs have Article III standing to challenge the legality of the 2030 Census and 2031 Apportionment.

69. Paragraph 69 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admit that the cited source contains the quoted text. The source otherwise speaks for itself.

70. Paragraph 70 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor lack sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in Paragraph 70 and therefore deny them.

71. Paragraph 71 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor lack sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in Paragraph 71 and therefore deny them.

72. Paragraph 72 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor lack sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in

Paragraph 72 and therefore deny them.

73. Paragraph 73 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor lacks sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in Paragraph 73 and therefore deny them.

74. Paragraph 74 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor lacks sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in Paragraph 74 and therefore deny them.

75. Paragraph 75 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits that the cited sources contain the quoted text and deny that Missouri and the Individual Plaintiffs have standing to challenge the 2030 Census and 2031 Apportionment.

76. Preceding Paragraph 76 is a header to which no response is required. To the extent a response is required, Proposed Intervenor denies the allegation in the header. Paragraph 76 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor denies the allegations in Paragraph 76.

77. Paragraph 77 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits the allegations in Paragraph 77.

78. Paragraph 78 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits the allegations in Paragraph 78.

79. Paragraph 79 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor's lack sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in Paragraph 79 and therefore deny them.

80. Paragraph 80 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor's lack sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in Paragraph 80 and therefore deny them.

81. Proposed Intervenor's admit that the cited source contains the quoted text but otherwise lack sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in Paragraph 81 and therefore deny them.

82. Paragraph 82 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor's deny the allegations in Paragraph 82.

83. Paragraph 83 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor's admit that the cited source contains the quoted text but otherwise lack sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in Paragraph 83 and therefore deny them.

84. Paragraph 84 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor's lack sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in Paragraph 84 and therefore deny them.

85. Paragraph 85 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits that the cited sources contained the quoted text but otherwise lack sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in Paragraph 85 and therefore deny them. Proposed Intervenor denies that McCann has Article III standing.

86. Paragraph 86 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits that the cited source contains the quoted text but otherwise lack sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in Paragraph 86 and therefore deny them. Proposed Intervenor denies that the Fishers have a representational injury.

87. Paragraph 87 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits that the cited source contains the quoted text and admit the 2020 Census found the cited population figures for Jackson and Cass Counties, but otherwise lack sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in Paragraph 87, including footnote 21, and therefore deny them. Proposed Intervenor denies that Mason has a representational injury.

88. Paragraph 88 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor denies the allegations in Paragraph 88.

89. Paragraph 89 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits that the cited sources contain the quoted text and otherwise deny the allegations in Paragraph 89.

90. Paragraph 90 contains legal contentions, characterizations, conclusions, and opinions

to which no response is required. To the extent a response is required, Proposed Intervenors admit that the cited sources contain the quoted text and otherwise deny the allegations in Paragraph 90.

91. Preceding Paragraph 91 is a header to which no response is required. To an extent a response is required, Proposed Intervenors deny the allegation in the header. Paragraph 91 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenors admit that the cited sources contain the quoted text and otherwise deny the allegations in Paragraph 91.

92. Proposed Intervenors admit the allegations in Paragraph 92.

93. Paragraph 93 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenors admit that Missouri receives federal funding that relies on Census data and that the cited sources contain the quoted text. Proposed Intervenors otherwise deny the allegations in Paragraph 93.

94. Paragraph 94 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenors admit that some federal highway safety funding is based on Census data and that the cited source contains the quoted text. Proposed Intervenors otherwise deny the allegations in Paragraph 94.

95. Paragraph 95 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenors state that the cited NHTSA press release speaks for itself. Proposed Intervenors otherwise deny the allegations in Paragraph 95.

96. Paragraph 96 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenors admit that the cited sources contain the quoted text and that some federal programs rely on census data

to apportion funding.

97. Paragraph 97 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor deny the allegations in Paragraph 97.

98. Paragraph 98 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor lack sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in Paragraph 98 and therefore deny them.

99. Paragraph 99 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor lack sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in Paragraph 99 and therefore deny them.

100. Paragraph 100 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor deny the allegations in Paragraph 100.

101. Paragraph 101 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor deny the allegations in Paragraph 101. Proposed Intervenor deny that Plaintiffs are entitled to junctive and declaratory relief.

102. Proposed Intervenor admit the allegations in Paragraph 102.

103. Proposed Intervenor admit the allegations in Paragraph 103.

104. Proposed Intervenor deny the allegations in Paragraph 104.

105. Proposed Intervenor deny the allegations in Paragraph 105.

106. Preceding Paragraph 106 is a header to which no response is required. To an extent a response is required, Proposed Intervenor deny the allegation in the header. Paragraph 106 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admit that the cited sources contain the quoted text and otherwise deny the allegations in Paragraph 106.

107. Preceding Paragraph 107 is a header to which no response is required. To an extent a response is required, Proposed Intervenor deny the allegation in the header. Paragraph 107 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admit that the cited source contains the quoted text and otherwise deny the allegations in Paragraph 107.

108. Paragraph 108 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admit that the cited sources contain the quoted text and otherwise deny the allegations in Paragraph 108.

109. Paragraph 109 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admit that the cited sources contain the quoted text and otherwise deny the allegations in Paragraph 109.

110. Paragraph 110 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admit that the cited sources contain the quoted text and otherwise deny the allegations in Paragraph 110.

111. Paragraph 111 contains legal contentions, characterizations, conclusions, and

opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits that the cited sources contain the quoted text and otherwise deny the allegations in Paragraph 111.

112. Paragraph 112 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor denies the allegations in Paragraph 112.

113. Paragraph 113 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor denies the allegations in Paragraph 113.

114. Paragraph 114 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits that the cited sources contain the quoted text. The sources speak for themselves.

115. Paragraph 115 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits that the cited sources contain the quoted text. The sources speak for themselves.

116. Paragraph 116 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits that the cited sources contain the quoted text. The sources speak for themselves.

117. Paragraph 117 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits that the cited sources contain the quoted text. The sources speak for themselves.

118. Paragraph 118 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed

Intervenors admit that the cited sources contain the quoted text and otherwise deny the allegations in Paragraph 118.

119. Paragraph 119 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenors state that the cited sources speak for themselves and otherwise deny the allegations in Paragraph 119.

120. Paragraph 120 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenors admit that the cited sources contain the quoted text and otherwise deny the allegations in Paragraph 120.

121. Paragraph 121 contains legal contentions, characterizations, conclusions, and opinions to which no response is required.

122. Paragraph 122 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenors admit that the cited sources contain the quoted text and otherwise deny the allegations in Paragraph 122.

123. Paragraph 123 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenors admit that the cited sources contain the quoted text and otherwise deny the allegations in Paragraph 123.

124. Paragraph 124, including footnote 35, contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenors admit that the cited sources contain the quoted text and otherwise deny the

allegations in Paragraph 124.

125. Paragraph 125 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits that the cited sources contain the quoted text and otherwise deny the allegations in Paragraph 125.

126. Paragraph 126 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor denies the allegations in Paragraph 126.

127. Paragraph 127 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits that certain travelers present in a state on census day are not counted in the census and that the cited source contains the quoted text. Proposed Intervenor otherwise denies the allegations in Paragraph 127.

128. Proposed Intervenor lacks sufficient knowledge and information to form a belief as to the truth or falsity of the allegations in Paragraph 128 and therefore denies them.

129. Paragraph 129 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits that certain foreign diplomatic personnel have been excluded from the decennial Census and apportionment.

130. Paragraph 130 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits that the cited source contains the quoted text and otherwise denies the allegations in Paragraph 130.

131. Preceding Paragraph 131 is a header to which no response is required. To an extent a response is required, Proposed Intervenor deny the allegation in the header. Paragraph 131 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor deny the allegations in Paragraph 131.

132. Paragraph 132 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admit that the cited sources contain the quoted text and otherwise deny the allegations in Paragraph 132.

133. Paragraph 133 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admit that the cited sources contain the quoted text and otherwise deny the allegations in Paragraph 133.

134. Paragraph 134 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admit that the cited sources contain the quoted text and otherwise deny the allegations in Paragraph 134.

135. Paragraph 135 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admit that the cited sources contain the quoted text and otherwise deny the allegations in Paragraph 135.

136. Preceding Paragraph 136 is a header to which no response is required. To an extent a response is required, Proposed Intervenor deny the allegation in the header. Paragraph 136

contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor deny the allegations in Paragraph 136.

137. Paragraph 137 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor deny the allegations in Paragraph 137.

138. Paragraph 138 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admit that the cited source contains the quoted text and otherwise deny the allegations in Paragraph 138.

139. Paragraph 139 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admit that the cited sources contain the quoted text and otherwise deny the allegations in Paragraph 139.

140. Paragraph 140 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admit that the cited sources contain the quoted text. The sources speak for themselves. Proposed Intervenor otherwise deny the allegations in Paragraph 140.

141. Paragraph 141 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admit that the cited source contains the quoted text. The source speaks for itself.

142. Paragraph 142 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. Proposed Intervenor admit that women and children

should be included in the apportionment base but deny that depends on their immigration status.

143. Paragraph 143 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor deny the allegations in Paragraph 143.

144. Paragraph 144 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admit that the cited sources contain the quoted text and otherwise deny the allegations in Paragraph 144.

145. Paragraph 145 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor deny the allegations in Paragraph 145.

146. Preceding Paragraph 146 is a header to which no response is required. To an extent a response is required, Proposed Intervenor deny the allegation in the header. Paragraph 146 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor deny the allegations in Paragraph 146.

147. Paragraph 147 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admit that the cited sources contain the quoted text and otherwise deny the allegations in Paragraph 147.

148. Paragraph 148 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admit that the cited sources contain the quoted text and otherwise deny the allegations

in Paragraph 148.

149. Paragraph 149 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor deny the allegations in Paragraph 149.

150. Paragraph 150 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admit that the cited sources contain the quoted text and otherwise deny the allegations in Paragraph 150.

151. Paragraph 151 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor deny the allegations in Paragraph 151.

152. Preceding Paragraph 152 is a header to which no response is required. To an extent a response is required, Proposed Intervenor deny the allegation in the header. Paragraph 152 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor deny the allegations in Paragraph 152.

153. Paragraph 153 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admit that the cited sources contain the quoted text and otherwise deny the allegations in Paragraph 153.

154. Paragraph 154 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admit that citizens and legal permanent residents must register for military selective

service while certain aliens are excluded from the requirement, and otherwise deny the allegations in Paragraph 154.

155. Paragraph 155 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits that the cited sources contain the quoted text and otherwise deny the allegations in Paragraph 155.

156. Paragraph 156 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits that the cited sources contain the quoted text and otherwise deny the allegations in Paragraph 156.

157. Paragraph 157 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits that the cited sources contain the quoted text and otherwise deny the allegations in Paragraph 157.

158. Paragraph 158 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor denies the allegations in Paragraph 158.

159. Paragraph 159 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor denies the allegations in Paragraph 159.

160. Preceding Paragraph 160 is a header to which no response is required. To the extent a response is required, Proposed Intervenor denies the allegation in the header. Paragraph 160 contains legal contentions, characterizations, conclusions, and opinions to which no response is

required. To the extent a response is required, Proposed Intervenor admits the cited sources contain the quoted text. The sources speak for themselves.

161. Paragraph 161 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor denies the allegations in Paragraph 161.

162. Paragraph 162 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits that the Department of Commerce promulgated and implemented the Final 2020 Census Residence Criteria and Residence Situations and that the Residence Criteria contains the quoted text. Proposed Intervenor otherwise denies the allegations in Paragraph 162.

163. Paragraph 163 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits the cited source contains the quoted text. The source speaks for itself. Proposed Intervenor otherwise denies the allegations in Paragraph 163.

164. Paragraph 164 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits the cited source contains the quoted text. The source speaks for itself. Proposed Intervenor otherwise denies the allegations in Paragraph 164.

165. Paragraph 165 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits the cited source contains the quoted text. The source speaks for itself. Proposed Intervenor otherwise denies the allegations in Paragraph 165.

166. Paragraph 166 contains legal contentions, characterizations, conclusions, and

opinions to which no response is required. To the extent a response is required, Proposed Intervenor deny the allegations in Paragraph 166.

167. Paragraph 167 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor deny the allegations in Paragraph 167.

168. Paragraph 168 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admit the cited sources contain the quoted text. Proposed Intervenor otherwise deny the allegations in Paragraph 168.

169. Paragraph 169 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admit the cited sources contain the quoted text. Proposed Intervenor otherwise deny the allegations in Paragraph 169.

170. Paragraph 170 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor deny the allegations in Paragraph 170.

171. Paragraph 171 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor deny the allegations in Paragraph 171.

CAUSES OF ACTION

COUNT 1

172. Proposed Intervenor incorporate by reference each of their preceding admissions, denials, and statements as if fully set forth herein.

173. Proposed Intervenor admits the allegations in Paragraph 173.

174. Paragraph 174 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits the cited source contains the quoted text and otherwise denies the allegations in Paragraph 174.

175. Paragraph 175 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits the cited source contains the quoted text and otherwise denies the allegations in Paragraph 175.

176. Proposed Intervenor denies the allegations in Paragraph 176.

COUNT 2

177. Proposed Intervenor incorporates by reference each of their preceding admissions, denials, and statements as if fully set forth herein.

178. Proposed Intervenor admits the allegations in Paragraph 178.

179. Paragraph 179 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits the cited source contains the quoted text and otherwise denies the allegations in Paragraph 179.

180. Paragraph 180 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, Proposed Intervenor admits the cited source contains the quoted text and otherwise denies the allegations in Paragraph 180.

181. Proposed Intervenor denies the allegations in Paragraph 181.

COUNT 3

182. Proposed Intervenors incorporate by reference each of their preceding admissions, denials, and statements as if fully set forth herein.

183. Proposed Intervenors admit the allegations in Paragraph 183.

184. Proposed Intervenors admit the allegations in Paragraph 184.

185. Proposed Intervenors deny the allegations in Paragraph 185.

186. Proposed Intervenors deny the allegations in Paragraph 186.

COUNT 4

187. Proposed Intervenors incorporate by reference each of their preceding admissions, denials, and statements as if fully set forth herein.

188. Proposed Intervenors admit the allegations in Paragraph 188.

189. Proposed Intervenors admit the allegations in Paragraph 189.

190. Proposed Intervenors deny the allegations in Paragraph 190.

191. Proposed Intervenors deny the allegations in Paragraph 191.

COUNT 5

192. Proposed Intervenors incorporate by reference each of their preceding admissions, denials, and statements as if fully set forth herein.

193. Proposed Intervenors admit the cited source contains the quoted text. The source speaks for itself.

194. Proposed Intervenors deny the allegations in Paragraph 194.

195. Proposed Intervenors deny the allegations in Paragraph 195.

196. Proposed Intervenors deny the allegations in Paragraph 196.

197. Proposed Intervenors deny the allegations in Paragraph 197.

COUNT 6

198. Proposed Intervenor incorporate by reference each of their preceding admissions, denials, and statements as if fully set forth herein.

199. Proposed Intervenor admit the cited source contains the quoted text. The source speaks for itself.

200. Proposed Intervenor deny the allegations in Paragraph 200.

201. Proposed Intervenor deny the allegations in Paragraph 201.

COUNT 7

202. Proposed Intervenor incorporate by reference each of their preceding admissions, denials, and statements as if fully set forth herein.

203. Proposed Intervenor admit the allegations in Paragraph 203.

204. Proposed Intervenor deny the allegations in Paragraph 204.

205. Proposed Intervenor deny the allegations in Paragraph 205.

206. Proposed Intervenor deny the allegations in Paragraph 206.

COUNT 8

207. Proposed Intervenor incorporate by reference each of their preceding admissions, denials, and statements as if fully set forth herein.

208. Proposed Intervenor admit the allegations in Paragraph 208.

209. Proposed Intervenor deny the allegations in Paragraph 209.

210. Proposed Intervenor deny the allegations in Paragraph 210.

211. Proposed Intervenor deny the allegations in Paragraph 211.

COUNT 9

212. Proposed Intervenor incorporate by reference each of their preceding admissions,

denials, and statements as if fully set forth herein.

213. Proposed Intervenors admit the allegations in Paragraph 213.

214. Proposed Intervenors admit the allegations in Paragraph 214.

215. Proposed Intervenors deny the allegations in Paragraph 215.

216. Proposed Intervenors deny the allegations in Paragraph 216.

COUNT 10

217. Proposed Intervenors incorporate by reference each of their preceding admissions, denials, and statements as if fully set forth herein.

218. Proposed Intervenors admit the allegations in Paragraph 218.

219. Proposed Intervenors admit the allegations in Paragraph 219.

220. Proposed Intervenors deny the allegations in Paragraph 220.

221. Proposed Intervenors deny the allegations in Paragraph 221.

COUNT 11

222. Proposed Intervenors incorporate by reference each of their preceding admissions, denials, and statements as if fully set forth herein.

223. Proposed Intervenors admit the cited source contains the quoted text. The source speaks for itself.

224. Proposed Intervenors deny the allegations in Paragraph 224.

225. Proposed Intervenors deny the allegations in Paragraph 225.

226. Proposed Intervenors deny the allegations in Paragraph 226.

227. Proposed Intervenors deny the allegations in Paragraph 227.

COUNT 12

228. Proposed Intervenors incorporate by reference each of their preceding admissions,

denials, and statements as if fully set forth herein.

229. Proposed Intervenors admit the cited source contains the quoted text. The source speaks for itself.

230. Proposed Intervenors deny the allegations in Paragraph 230.

231. Proposed Intervenors deny the allegations in Paragraph 231.

COMPLAINT'S PRAYER FOR RELIEF

The complaint's prayer for relief contains an unnumbered paragraph followed by bullets numbered 1 to 10. Proposed Intervenors deny that Plaintiffs are entitled to any relief in this action.

1. Proposed Intervenors oppose Plaintiffs' request for the convening of a three-judge court under 28 U.S.C. § 2284(a).
2. Proposed Intervenors oppose Plaintiffs' request for a declaratory judgment.
3. Proposed Intervenors oppose Plaintiffs' request for a declaratory judgment.
4. Proposed Intervenors oppose Plaintiffs' request for a preliminary injunction and permanent injunction.
5. Proposed Intervenors oppose Plaintiffs' request for an injunction.
6. Proposed Intervenors oppose Plaintiffs' request for an injunction.
7. Proposed Intervenors oppose Plaintiffs' request for an injunction.
8. Proposed Intervenors oppose Plaintiffs' request for an injunction.
9. Proposed Intervenors oppose Plaintiffs' request for a remand.
10. Proposed Intervenors oppose Plaintiffs' request any other relief.

GENERAL DENIAL

Proposed Intervenors deny every allegation in the Complaint that is not expressly admitted herein.

AFFIRMATIVE DEFENSES

1. Plaintiffs' claims are barred in whole or in part for failure to state a claim upon which relief can be granted.
2. Plaintiffs' claims are moot as to the 2020 Census and 2021 Apportionment.
3. Plaintiffs' claims as to the 2020 Census and 2021 Apportionment are untimely under the statute of limitations.
4. Plaintiffs' claims as to the 2020 Census and 2021 Apportionment are barred by laches.
5. Plaintiffs' claims are not ripe as to the 2030 Census and 2031 Apportionment.
6. Plaintiffs' claims are barred because Plaintiffs lack standing.
7. Plaintiffs' claims are barred because they seek relief inconsistent with federal law and the United States Constitution.
8. Proposed Intervenors reserve the right to assert additional affirmative defenses—including, but not limited to, those set forth in Federal Rule of Civil Procedure 8(c)—as additional facts are discovered.

PROPOSED INTERVENORS' PRAYER FOR RELIEF

Having fully answered Plaintiffs' Complaint, Proposed Intervenors pray for judgment as follows:

- A. That the Court dismiss Plaintiffs' Complaint;
- B. That judgment be entered in favor of Proposed Intervenors and against Plaintiffs on Plaintiffs' Complaint and that Plaintiffs take nothing thereby;
- C. That Proposed Intervenors be awarded reasonable attorneys' fees and costs under any applicable statute or equitable doctrine; and
- D. For such other and further relief as the Court deems appropriate.

Dated: February 27, 2026

Respectfully submitted,

/s/ J. Andrew Hirth
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**Pro hac vice applications forthcoming*

Counsel for Proposed Intervenors