

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

Paul Goldman,

)

Plaintiff,

)

)

v.

)

Civil Action No: 3:21-CV-420

)

Ralph Northam, et al.,

)

)

Defendants.

)

**PROSPECTIVE PLAINTIFF JOSHUA STANFIELD'S MOTION FOR JOINDER
AS PLAINTIFF AND MEMORANDUM OF LAW IN SUPPORT**

Pursuant to Rule 20 of the Federal Rules of Civil Procedure, Joshua Stanfield hereby moves to join Paul Goldman as Plaintiff on the grounds that Stanfield asserts equivalent rights to relief arising out of the same series of transactions or occurrences, and under questions of law or fact common to all plaintiffs in this action. Joinder of Prospective Plaintiff Stanfield will foster the objectives of Rule 20 and will not result in prejudice, expense, or delay.

I.

FACTUAL BACKGROUND

Throughout 2020 – as public debate and discussion raged over the proposed Virginia Redistricting Commission Amendment – there was another debate taking place behind the scenes. Politicians, consultants, and sundry political insiders were speculating over the implications of tardy 2020 U.S. Census data and debating whether or not Virginia would have House of Delegates elections in 2021, 2022, and 2023. At least one mainstream Virginia news outlet reported the possibility in 2020.¹

¹ See Graham Moomaw's "COVID-19 could force the Virginia House to have elections 3 years in a row. Here's how:" in *The Virginia Mercury*, May 6, 2020: <https://www.virginiamercury.com/2020/05/06/covid-19-could-force-the-virginia-house-to-have-elections-3-years-in-a-row-heres-how>.

In early 2021, mainstream discussion and speculation about the prospect of House of Delegates elections three years in a row started to heat up.² As the year continued on, there was additional news coverage of the topic³ – and even more behind-the-scenes political chatter.

On June 8, 2021, Plaintiff Goldman filed his original complaint against all Defendants claiming violations of Plaintiff's rights under both the U.S. Constitution and the Constitution of Virginia.

On July 6, 2021, Virginia Public Media reporter Ben Paviour's article "Lawsuit Seeks Three-in-a-Row Elections for Virginia House of Delegates" quotes Prospective Plaintiff's own representative in Virginia's House of Delegates, Delegate Mike Mullin, thus: "I suspect that we will have maps not for this cycle, but we will have next year, a whole new round of elections with new maps."⁴

On August 13, 2021, Prospective Plaintiff sent a request for records pursuant to Va. Code § 2.2-3700 et seq. to Virginia State Senator George Barker, Virginia Delegate Marcus Simon, the Virginia Department of Elections, and the Virginia Redistricting Commission, seeking "a copy of the 2020 U.S. Census data that includes population count by state legislative district." Senator Barker, Delegate Simon, and the Virginia Department of Elections responded that they were not in possession of the data in question.

On August 17, 2021, Prospective Plaintiff purchased the necessary equipment and software to download, populate, and analyze the 2020 U.S. Census data in accordance with the Census Bureau instructions online.⁵ Prospective Plaintiff generated, from the

² See, e.g., Dean Mirshahi's "Census delays could make the Virginia House hold elections in 2021, 2022 and 2023: 'Still don't have a final answer'" in *WRIC*, January 30, 2021: <https://www.wric.com/news/virginia-news/census-delays-could-make-the-virginia-house-hold-elections-in-2021-2022-and-2023-still-dont-have-a-final-answer>.

³ See, e.g., Greg Schneider's "Census data delay could freeze Virginia House districts, raises prospect of elections for three straight years" in *The Washington Post*, February 16, 2021: https://www.washingtonpost.com/local/virginia-politics/census-delays-virginia-elections/2021/02/16/0f4488ac-706f-11eb-b8a9-b9467510f0fe_story.html.

⁴ See: <https://vpm.org/news/articles/23472/lawsuit-seeks-three-in-a-row-elections-for-virginia-house-of-delegates>

⁵ 2020 U.S. Census Bureau legacy data files, technical documentation, and instructions remain available at: <https://www.census.gov/programs-surveys/decennial-census/about/rdo/summary-files/2020.html>

U.S. Census data and through the U.S. Census Bureau's technical processes, an output of 2020 population counts for existing Virginia House of Delegates and State Senate districts.

Prospective Plaintiff, in analyzing the population counts generated through the U.S. Census process, noted the extraordinary difference between the populations of House of Delegates District 3 (71,122) and House of Delegates District 87 (130,110).

On August 18, 2021, Prospective Plaintiff sent an electronic copy of 2020 population counts for existing Virginia House of Delegates and State Senate districts, as generated by Prospective Plaintiff through the U.S. Census Bureau's technical processes, to Assistant Attorney General Carol Lewis and to Plaintiff Goldman.

On August 19, 2021, the Virginia Redistricting Commission Support Staff at the Division of Legislative Services responded to Prospective Plaintiff's August 13 request by providing three spreadsheets containing 2020 U.S. Census population data for Virginia's current congressional, House of Delegates, and State Senate districts (Exhibit 1). Prospective Plaintiff provided these spreadsheets to Plaintiff Goldman the same day.

Prospective Plaintiff, in analyzing the official 2020 U.S. Census population counts provided by the Virginia Redistricting Commission, again noted the drastic difference between the population of House of Delegates District 3 (71,122) and House of Delegates District 87 (130,082). Prospective Plaintiff took note of the population of his own House of Delegates District 93 (82,347) and confirmed that, following the logic and case law presented by Plaintiff in his original and amended complaints, Prospective Plaintiff's rights under the U.S. Constitution and Constitution of Virginia have been and continue to be violated.

II.

PERMISSIVE JOINDER UNDER RULE 20 IS APPROPRIATE IN THIS CASE

Rule 20(a)(1) of the Federal Rules of Civil Procedure provides:

(1) Plaintiffs. Persons may join in one action as plaintiffs if:

(A) they assert any right to relief jointly, severally, or in the alternative with respect to or arising out of the same transaction, occurrence, or series of transactions or occurrences; and

(B) any question of law or fact common to all plaintiffs will arise in the action.

Moving pursuant to F.R.C.P. 20 is the appropriate method for joinder. When multiple prospective plaintiffs tried to join an existing complaint by filing a motion under Rule 20 – nearly two years after the defendant had answered – the court observed, in *Breen v. Chao*, No. CV 05-0654 (PLF), 2018 WL 1509077 (D.D.C. Mar. 27, 2018), that it “has discretion in determining whether to permit the prospective plaintiffs to join this case, so long as it does so ‘on just terms’ and in accordance with Rule 20 governing permissive joinder.” *Id.* At *9. Yet “the court has discretion to deny joinder if it determines that the addition of the party under Rule 20 will not foster the objectives of the rule, but will result in prejudice, expense, or delay.” 7 Charles Alan Wright, Arthur R. Miller Mary Kay Kane, *Federal Practice and Procedure* § 1652 (3d ed. 2001).

Rule 20 requires that Prospective Plaintiff meet both prongs of the two-prong test. *Gregory v. FedEx Ground Package Sys., Inc.*, 2:10-CV-630, 2012 WL 2396873, at *9 (E.D. Va. May 9, 2012), *adopted by* 2012 WL 2396861 (E.D. Va. June 25, 2012). The two prongs “are to be liberally construed in the interest of convenience and judicial economy... in a manner that will secure the just, speedy, and inexpensive determination of th[e] action.” *Lane v. Tschetter*, 2007 WL 2007493, at *7 (D.D.C. July 10, 2007) (citing *Jonas v. Conrath*, 149 F.R.D. 520, 523 (S.D. W.Va. 1993)). Courts are to construe Rule 20 “in light of its purpose, which is to promote trial convenience and expedite the final determination of disputes, thereby preventing multiple lawsuits.” *Aleman v. Chugach Support Servs., Inc.*, 485 F.3d 206, 218 n.5 (4th Cir. 2007).

In the present case, Prospective Plaintiff seeks to join as plaintiff because he asserts equivalent rights to relief arising out of the same series of transactions or occurrences, and under questions of law or fact common to all plaintiffs in this action. Prospective Plaintiff seeks to simply be added to Plaintiff’s Amended Complaint (filed September 10, 2021), an addition that will foster the objectives of Rule 20 and will not result in prejudice, expense, or delay.⁶

⁶ The Court, should it prefer, may add Prospective Plaintiff pursuant to F.R.C.P. 21: “On motion or on its own, the court may at any time, on just terms, add or drop a party.”

**A. RIGHTS TO RELIEF ASSERTED BY PLAINTIFF AND PROSPECTIVE
PLAINTIFF ARISE OUT OF THE SAME SERIES OF TRANSACTIONS
OR OCCURRENCES**

In order to meet the requirement of Rule 20(a)(1)(A), Prospective Plaintiff must satisfy the “transactional relatedness test” requiring his right to relief to arise under the same transaction or occurrence as the existing Plaintiff. *See Davidson v. District of Columbia*, 736 F. Supp. 2d 115, 119 (D.D.C. 2010). The absolute identity of the events is unnecessary, and the transaction and occurrence test is applied on a case-by-case basis. *Saval v. BL Ltd.*, 710 F.2d 1027, 1031 (4th Cir. 1983).

Plaintiff’s Amended Complaint (filed September 10, 2021) details a series of transactions or occurrences under which arise his right to relief: “State officials are plowing ahead, for apparently the first in Virginia history, to hold House of Delegates elections in a reapportionment year pursuant to old House of Delegates districts created according to an old, obsolete U.S. Census. This state action is irrefutably unconstitutional” (Paragraph 115-16)⁷; “The decision of the Governor and the top state election officials to not seek guidance as to the constitutionality of the upcoming House of Delegates general election despite Va. Code § 2.2-505 raises the inference that such Defendants have not operated with the ‘good faith’ generally required in redistricting law” (Paragraph 129)⁸; and “This failure along with the other governmental conduct at issue raises the inference that Defendants along with other state officials have put the interest of incumbent legislators ahead of the public’s interest, since it is a fair inference to assume incumbents would rather have a two-year term and thus not risk losing their seats in a 2022 primary or special election” (Paragraph 130).

Prospective Plaintiff’s right to relief arises under precisely the same transactions and occurrences as that of Plaintiff Goldman, namely: Defendants’ insistence on proceeding with 2021 House of Delegates elections in blatantly unconstitutional districts; Defendants’ seeming refusal to seek guidance per Va. Code § 2.2-505 regarding the constitutionality of the 2021 House of Delegates elections; and Defendants’ seeming prioritization of the interests of incumbent legislators over those of the public. Given that

⁷ See also Paragraphs 5 and 48.

⁸ See also Paragraphs 13-16.

the transactions and occurrences under which Prospective Plaintiff's right to relief arises are *identical* to those under which Plaintiff Goldman's right to relief arises, Prospective Plaintiff clearly satisfies the requirement of Rule 20(a)(1)(A).

**B. PROPOSED JOINDER WILL PERMIT THE ADJUDICATION OF
NUMEROUS COMMON QUESTIONS OF LAW AND FACT**

In order to meet the requirement of Rule 20(a)(1)(B), Prospective Plaintiff must demonstrate "any question of law or fact common to all plaintiffs." This second prong "requires only that there be some common question of law or fact as to all of the plaintiffs' claims, not that all legal and factual issues be common to all the plaintiffs." *Disparte v. Corporate Executive Bd.*, 223 F.R.D. 7, 12 (D.D.C. 2004) (citing *Mosley v. General Motors Corp.*, 497 F.2d 1330, 1334 (8th Cir. 1974)).

Plaintiff's Amended Complaint (filed September 10, 2021) details a series of questions of law: "Indeed, nearly fifty years ago, in *Mahan v. Howell*, 410 U.S. 315 (1973), involving 1971 Virginia House of Delegates redistricting, the Court found Virginia state officials had to make a good faith effort in a reapportionment year to adhere to their responsibilities under the Equal Protection Clause" (Paragraph 91); "*Cosner* ruled that an injury to Plaintiffs had already occurred since the Commonwealth intended to conduct the upcoming election under an unconstitutional plan. These are the same circumstances in the instant matter" (Paragraph 94)⁹; "Since *Reynolds*, the U.S. Supreme Court has made clear Plaintiff has a constitutional right to have his vote counted equally through his representatives elected to the General Assembly as the principle of equal legislative body representation as regards the population of legislative districts is [sic] a "fundamental goal" of our system of laws. *Wesberry v. Sanders*, 376 U.S. (1964)" (Paragraph 124); "The state's plan to hold the upcoming general elections for members of the House of Delegates using the existing state legislative districts created due to the 2011 Census violates Article II, Section 6, and 6-A of the Constitution of Virginia (Paragraph 137); and "Any alleged lack of Census data, while it may explain the failure of state officials to abide by the state and federal constitutions, cannot obliterate the

⁹ See also Paragraph 96.

Equal Protection Clause rights of the plaintiff, much less the citizenry of Virginia, to have a constitutionally reapportioned state legislature as soon as possible” (Paragraph 101).

All of the above questions of law are common to both Plaintiff and Prospective Plaintiff, namely: the question of whether or not Virginia officials must make a “good faith effort” in a reapportionment year to remain compliant with the Equal Protection Clause of the Fourteenth Amendment to the U.S. Constitution; the question of whether or not *Cosner v. Dalton*, 522 F. Supp. 350 (E.D. Va. 1981) remains good law; the question of an Equal Protection Clause violation as a result of unequally weighted district populations; the question of whether or not violations of Article II, Section 6 and 6-A of the Constitution of Virginia have occurred; and the question of whether or not tardy U.S. Census data obliterates the Equal Protection Clause rights of citizens.

Prospective Plaintiff resides in Yorktown, Virginia, within the boundaries of House of Delegates District 93. District 93, according to the 2020 U.S. Census data released to Prospective Plaintiff by the Virginia Redistricting Commission, has a population of 82,347. According to that same data set, House of Delegates District 3 has a population of 71,122. Prospective Plaintiff’s district is therefore over 15% greater in population than House District 3. With *Mahan and Harris v. Arizona Independent Redistricting Commission*, 136 S. Ct. 1301, 1307 (2016) in mind, this over 15% deviation allows Prospective Plaintiff to claim common questions of law regarding Equal Protection Clause concerns and whether or not *Cosner* is still good law. Prospective Plaintiff clearly satisfies the requirement of Rule 20(a)(1)(B), as there are numerous common questions of law and fact.

C. PROPOSED JOINDER WILL NOT RESULT IN PREJUDICE, EXPENSE, OR DELAY

Prospective Plaintiff is not making substantive changes to the original or amended complaints and does not seek to add new claims. Discovery has not yet begun, and the Court recently denied Plaintiff’s September 10, 2021 Motion for Expedited Hearing, suggesting the Court is not operating on an accelerated schedule in the instant matter. The joinder of Prospective Plaintiff, therefore, will not result in prejudice, expense, or delay.

**D. PROPOSED JOINDER WILL PROMOTE TRIAL CONVENIENCE AND
EXPEDITE THE FINAL DETERMINATION OF DISPUTES**

Courts are to construe Rule 20 “in light of its purpose, which is to promote trial convenience and expedite the final determination of disputes, thereby preventing multiple lawsuits.” *Aleman*. Joinder of Prospective Plaintiff allows the Court to resolve the issues at hand in an expedited fashion, as it would prevent Prospective Plaintiff from filing his own independent complaint concerning the same transactions, occurrences, and common questions of law and fact.

**III.
MEET AND CONFER**

In an act of good faith, on September 13, 2021, Prospective Plaintiff emailed Assistant Attorney General Carol Lewis (attorney for Defendants) and Plaintiff Goldman in order to inform all parties of Prospective Plaintiff’s intent to move to join the present case. Prospective Plaintiff ended the email by asking “if either of you plan to oppose my motion to join and whether or not you would like to meet and confer on the issue.”

Plaintiff Goldman replied, in part, “I will not object to your joining.” Assistant Attorney General Lewis replied tersely: “Defendants are not able to answer as to whether they will object or consent to your joinder without further information as to the grounds for your standing to join,” without any indication of interest to meet and confer (Exhibit 2).

Prospective Plaintiff therefore has not had the opportunity to meet and confer with Plaintiff and Defendants.

**IV.
CONCLUSION**

Prospective Plaintiff Joshua Stanfield’s Motion for Joinder should be granted, as it would serve the interests of justice and would not cause prejudice, expense, or delay in this litigation. Finally, Prospective Plaintiff begs forgiveness from the Court for any errors in customary formatting, style, or argumentation in this motion. Prospective

Plaintiff is not a lawyer, has not attended law school, and has submitted Local Rule 83.1(M) Certification that no attorney prepared or assisted in the preparation of this motion.

Dated this 16th day of September, 2021.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'J. Stanfield', is written over a horizontal line.

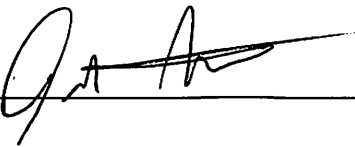
Joshua Stanfield
208 Crestwood Court
Yorktown, VA 23692
jstanfield@gmail.com
757.364.8401
Pro se

CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that on September 17, 2021, I mailed this Motion for Joinder and Memorandum of Law in Support to the Clerk of the Court in paper form via USPS First Class Mail. A true copy of said motion was also sent, via USPS First Class Mail, to:

Carol Lewis
OAG / Attorney for Defendants
202 North 9th Street
Richmond, VA 23219
804.692.0558
CLewis@oag.state.va.us

Paul Goldman
Pro se
P.O. Box 17033
Richmond, VA 23226
804.833.6313
Goldmanusa@aol.com

A handwritten signature in black ink, appearing to read 'Joshua Stanfield', is written over a horizontal line.

Joshua Stanfield
Pro se
208 Crestwood Court
Yorktown, VA 23692
757.364.8401
jstanfield@gmail.com

Exhibit 1



Josh Stanfield <jstanfield@gmail.com>

Response to 8/12/21 request for records under the Virginia Freedom of Information Act

VA Redistricting <varedistrictingcommission@dls.virginia.gov>
To: jstanfield@gmail.com

Thu, Aug 19, 2021 at 3:52 PM

Dear Mr. Stanfield,

The Virginia Redistricting Commission is in receipt of your request for records made on August 12, 2021, in accordance with the Virginia Freedom of Information Act (§ 2.2-3700 et seq.). Specifically, you request a copy of the 2020 U.S. Census data that includes population count by state legislative district.

Attached are Virginia's current senate, house ,and congressional districts with 2020 total population numbers.

Thank you.

Virginia Redistricting Support Staff
Division of Legislative Services

3 attachments



CurrentCongPops.xlsx
10K



CurrentHousePops.xlsx
12K



CurrentSenatePops.xlsx
11K

Exhibit 1

Congressional District: Total Pop	
1	827,606
2	750,830
3	756,761
4	789,815
5	739,211
6	763,401
7	817,419
8	798,257
9	696,755
10	885,422
11	805,916

Exhibit 1

House District Total Pop

1	72,160
2	95,943
3	71,122
4	73,740
5	78,048
6	75,907
7	83,147
8	82,624
9	76,561
10	104,752
11	82,567
12	80,929
13	101,024
14	77,452
15	83,134
16	76,046
17	84,322
18	84,753
19	79,238
20	83,233
21	87,522
22	82,430
23	85,200
24	79,775
25	91,409
26	85,732
27	84,046
28	91,396
29	89,512
30	88,631
31	90,269
32	101,567
33	96,452
34	83,109
35	92,718
36	85,767
37	86,978
38	83,282
39	83,168
40	86,857
41	82,736
42	84,433
43	86,451
44	84,955
45	94,426
46	87,847

Exhibit 1

47	92,865
48	89,069
49	91,445
50	92,429
51	91,531
52	96,642
53	90,002
54	92,735
55	88,538
56	94,344
57	90,063
58	86,637
59	80,792
60	74,075
61	76,980
62	87,096
63	86,360
64	90,632
65	99,689
66	87,989
67	85,614
68	85,223
69	84,405
70	86,701
71	93,525
72	87,217
73	85,509
74	83,132
75	73,868
76	90,306
77	85,670
78	92,633
79	73,909
80	81,389
81	85,736
82	82,393
83	86,984
84	81,895
85	86,550
86	88,505
87	130,082
88	102,140
89	81,246
90	80,561
91	78,950
92	81,511

Exhibit 1

93	82,347
94	81,279
95	83,170
96	92,322
97	89,621
98	79,664
99	83,356
100	80,697

Exhibit 1

Senate District	Total Pop
1	210,332
2	201,145
3	227,443
4	217,849
5	204,662
6	192,220
7	212,627
8	203,368
9	211,030
10	221,865
11	234,129
12	224,935
13	285,955
14	223,946
15	187,845
16	224,850
17	231,913
18	208,217
19	201,773
20	192,077
21	209,459
22	199,174
23	210,087
24	220,288
25	208,433
26	212,085
27	229,423
28	240,019
29	242,257
30	225,568
31	220,011
32	216,112
33	242,481
34	207,669
35	210,324
36	225,792
37	208,256
38	182,827
39	216,153
40	186,794

Exhibit 2



Josh Stanfield <jstanfield@gmail.com>

Notice of Intent to File Motion to Join as Plaintiff (Case No: 3:21-CV-420)

PAUL GOLDMAN <goldmanusa@aol.com>

Mon, Sep 13, 2021 at 6:25 PM

To: Josh Stanfield <jstanfield@gmail.com>

Cc: "Lockerman, Heather Hays" <HLockerman@oag.state.va.us>, "McGill, Brittany A." <BMcGill@oag.state.va.us>, "Brown, Calvin C." <CBrown@oag.state.va.us>, "Carol L. Lewis" <CLewis@oag.state.va.us>

Josh,

I looked up your district. The Census data is clear as you say as a matter of statistics. Your district was referenced in my AMENDED COMPLAINT, paragraph 42-43.

I think all Virginians in those 80+ House districts with such gross population deviations have a right to defend their constitutional rights as a matter of law. So does every Sup. Court case I have read since *Mahan v Howell, a VA* case, decided by the Sup Ct in 1973. Paragraph #36.

Thus, I will not object to your joining. However, I should point out that I am likely to file an Amended Complaint challenging the constitutionality of the June primary being conducted in the old districts not merely using them in the upcoming Nov election without a Court order.

Thus, I will likely be asking for the Court to consider more than the Cosner type remedy proposed in my current Complaint. Every Attorney General and every state board of elections from 1971 until this year supported *Cosner*. The case does not sanction the use of the old districts in a primary without a Court order, in my view of course. The primary at issue occurred after the *Cosner* decision.

I am sorry citizens like yourself are being denied their equal protection rights under *Reynolds v Simms*. That you have take time to defend them considering the violation should have been obvious for months to the people you elected to office. Paragraph # 84.

Covid 19 and a late census doesn't deny you and other Virginians your right to equal protection of the laws per *Reynolds* until 2024. Paragraph #119.

I see where the AG may object to your joining. I really can't speak to that.

Sincerely,

PG

Paul Goldman

On Sep 13, 2021, at 12:42 PM, Lewis, Carol L. <CLewis@oag.state.va.us> wrote:

Josh,

Defendants are not able to answer as to whether they will object or consent to your joinder without further information as to the grounds for your standing to join.

Thank you,

Carol

Exhibit 2

Carol L. Lewis
Assistant Attorney General
Office of the Attorney General
202 North 9th Street
Richmond, Virginia 23219
(804) 692-0558 Office
CLewis@oag.state.va.us
<http://www.ag.virginia.gov>

<image001.jpg>

<image002.jpg>
<image003.jpg>

From: Josh Stanfield <jstanfield@gmail.com>
Sent: Monday, September 13, 2021 10:35 AM
To: PAUL GOLDMAN <Goldmanusa@aol.com>; Lewis, Carol L. <CLewis@oag.state.va.us>
Subject: Notice of Intent to File Motion to Join as Plaintiff (Case No: 3:21-CV-420)

Good morning,

I'm writing to inform both of you that I plan to file a motion to join *Goldman v. Northam et al.* (Case No: 3:21-CV-420) as a prospective *pro se* plaintiff. I'm not a lawyer, never attended law school, and I'm finalizing my motion and memorandum of law today without the assistance of any lawyer.

After reviewing the 2020 U.S. Census data for my House of Delegates district (HD 93) and districts in southwest Virginia, after reviewing the Constitution of Virginia, and after reading the motions filed thus far in *Goldman v. Northam et al.*, I believe I have standing.

After reviewing Rule 20(a)(1) of the Federal Rules of Civil Procedure, I believe I can satisfy both parts of the two-prong test required for joinder.

I'm reaching out to inquire if either of you plan to oppose my motion to join and whether or not you would like to meet and confer on the issue.

Thank you,

Josh Stanfield
208 Crestwood Court
Yorktown, VA 23692
757.364.8401

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond DIVISION

Paul Goldman

Plaintiff(s),

v.

Civil Action Number: 3:21-CV-420

Ralph Northam et. al.

Defendant(s).

LOCAL RULE 83.1(M) CERTIFICATION

I declare under penalty of perjury that:

PROSPECTIVE PLAINTIFF JOSHUA STANFIELD'S
MOTION FOR JOINDER AS PLAINTIFF AND
MEMORANDUM OF LAW IN SUPPORT

No attorney has prepared, or assisted in the preparation of

(Title of Document)

Joshua Stanfield

Name of *Pro Se* Party (Print or Type)



Signature of *Pro Se* Party

Executed on: 9.16.2021 (Date)

OR

The following attorney(s) prepared or assisted me in preparation of

(Title of Document)

(Name of Attorney)

(Address of Attorney)

(Telephone Number of Attorney)

Prepared, or assisted in the preparation of, this document

(Name of *Pro Se* Party (Print or Type))

Signature of *Pro Se* Party

Executed on: (Date)