

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

<p>UNITED STATES OF AMERICA,</p> <p>Plaintiff,</p> <p>v.</p> <p>WILLIAM FRANCIS GALVIN, in his official capacity as Secretary of the Commonwealth of Massachusetts,</p> <p>Defendant.</p>	<p>Case No. 25-cv-13816 (Hon. Leo T. Sorokin)</p>
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**MOTION OF COMMON CAUSE, JANE DOE INC., AND JUAN PABLO JARAMILLO
TO INTERVENE AS DEFENDANTS**

Common Cause, Jane Doe Inc., and Juan Pablo Jaramillo (collectively, “Proposed Intervenor”) respectfully move to intervene as Defendants pursuant to Rule 24(a) of the Federal Rules of Civil Procedure or, in the alternative, pursuant to Rule 24(b).

Proposed Intervenor are Common Cause, a non-partisan public interest organization dedicated to democracy and civic life in Massachusetts, Jane Doe Inc., a Massachusetts coalition of organizations who oppose domestic violence and represent and support survivors of domestic violence, and Juan Pablo Jaramillo, a Massachusetts voter. As set forth more fully in the memorandum of law filed concurrently with this motion, Proposed Intervenor are entitled to intervention as of right because their motion is timely, they and their members have unique, protectable interests in the subject matter of the lawsuit which will be threatened by the relief sought by Plaintiff the United States, and their interests may not be adequately represented by the existing defendant. Permissive intervention may also be granted because the motion is timely and

Proposed Intervenors' participation will aid in the development of the record and the resolution of the case.

Declarations supporting the motion are filed concurrently herewith, as attachments to the Declaration of Suzanne Schlossberg. A proposed order is attached to this Motion as Exhibit A. A proposed motion to dismiss is attached to this Motion as Exhibit B, by way of a response to the United States' Complaint. *See* Fed. R. Civ. P. 24(c).

Proposed Intervenors reserve the right to supplement their response to the Complaint within the time allowed for response by Rule 12 after intervention is granted. Proposed Intervenors request that, if intervention is granted, they be allowed to file a separate response to the United States's motion to compel (ECF No. 6) on the same schedule as Defendant Secretary Galvin.

Proposed Intervenors have conferred with Plaintiff the United States and Defendant Secretary Galvin and neither takes a position on the Motion.

CONCLUSION

The Court should grant the Motion to Intervene as Defendants as of right, or in the alternative, via permissive intervention.

Dated: December 22, 2025

Respectfully submitted,

/s/ Suzanne Schlossberg

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** application for admission pro hac vice
forthcoming*

CERTIFICATE OF SERVICE

I hereby certify that on December 22, 2025, a true and correct copy of the foregoing document was filed via the Court's CM/ECF system and that a copy will be sent automatically to all counsel of record. A copy will further be served by email on counsel for the United States and Secretary Galvin.

/s/ Suzanne Schlossberg

LOCAL RULE 7.1 CERTIFICATION

Pursuant to Local Rule 7.1, counsel for Proposed Intervenors have conferred with counsel for the parties regarding this Motion. Plaintiff the United States takes no position. Defendant Secretary of the Commonwealth Galvin also takes no position.

/s/ Suzanne Schlossberg