

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

CARROLL BOSTON CORRELL, Jr.,

Plaintiff,

v.

MARK R. HERRING, *et al.*,

Defendants.

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Civil Action No. 3:16-cv-00467-REP

**MOTION TO INTERVENE BY JOHN FREDERICKS, WAVERLY WOODS, MICHAEL
BELEFSKI, EUGENE DELGAUDIO, VIRGIL GOODE, TAMARA NEO, HOWARD
LIND, AND BRANDON HOWARD**

Pursuant to Federal Rule of Civil Procedure 24(a), John Fredericks, Waverly Woods, Michael Belefski, Eugene Delgaudio, Virgil Goode, Tamara Neo, Howard Lind, and Brandon Howard (collectively “Delegates”), who are Virginia delegates to the Republican National Convention, move to intervene as a matter of right. The Delegates have a direct and substantial interest in the laws respecting the operation of the national convention, especially the Virginia law that is related to how they will vote at the convention. Neither Plaintiff nor the state defendants will adequately represent the Delegates’ interests; thus, intervention by right under Rule 24(a) is warranted. In the alternative, the Delegates move to intervene by permission pursuant to Federal Rule of Civil Procedure 24(b).

Filed simultaneously with this motion is a memorandum in support of the motion, a proposed order granting the motion, and a proposed memorandum in opposition to Plaintiff’s Motion for a Temporary Restraining Order.

Dated: June 30, 2016

Respectfully submitted,

/s/ David A. Warrington

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CERTIFICATE OF SERVICE

I certify that on June 30, 2016, a copy of the foregoing was filed electronically with the Clerk of Court using the ECF system which will send notification to the following ECF participants:

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