

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
21 CVS 015426

NORTH CAROLINA LEAGUE OF
CONSERVATION VOTERS, et al.,

REBECCA HARPER, et al.,

Plaintiffs,

vs.

REPRESENTATIVE DESTIN HALL, in his
official capacity as Chair of the House
Standing Committee on Redistricting, et al.,

Defendants.

Consolidated with
21 CVS 500085

LEGISLATIVE DEFENDANTS' OPPOSITION TO MOTION TO INTERVENE

Legislative Defendants oppose the motion to intervene filed by Common Cause. In addition to the partisan gerrymandering claims which are already alleged by the *NCLCV* and *Harper* Plaintiffs, much of the claims and allegations proposed in the *Common Cause* complaint overlap with the racial vote dilution claims already being pursued in the complaint filed by the *NCLCV* plaintiffs. (Cf. *Common Cause* Proposed Compl. ¶¶2-4; 40-56; 62-76; 154-173 and *NCLCV* Compl. ¶¶ 65-70; 74-75; 82-87; 112; 132-137; 151-156; 221-240). As this Court noted in the Scheduling Order, this case is proceeding on an exceptionally expedited basis by the direction of the North Carolina Supreme Court. There is a high likelihood that participation by Common Cause as intervenor-plaintiff will cause unnecessary delay and additional motions practice above that which may already occur among the existing parties. Nothing in the Supreme Court's order requires this Court to allow the intervention (*NAACP v. Berger*, No. 416P21-1, Order

at 2 (N.C. Dec. 8, 2021) and it would not be in the interest of the efficient administration of justice for this Court to do so. Legislative Defendants do not oppose participation by Common Cause as *amicus curiae*.

Respectfully submitted this the 14th day of December, 2021.

/s/ Phillip J. Strach

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CERTIFICATE OF SERVICE

It is hereby certified that on this the 14th day of December, 2021, the foregoing was served on the individuals below by email:

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