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**UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA**

Mi Familia Vota, et al.,  
Plaintiffs,  
v.  
Katie Hobbs, et al.,  
Defendants,  
  
Republican National Committee,  
[Proposed] Intervenor-Defendant.  
  
Poder Latinx,  
Plaintiff,  
v.  
Katie Hobbs, et al.,  
Defendants,

Case No: 2:22-cv-00509 (Lead case)

Judge Susan R. Bolton

Case No: 2:22-cv-01003 (Consol. Case)

Judge Susan R. Bolton

**[PROPOSED] ANSWER OF  
[PROPOSED] INTERVENOR-  
DEFENDANT REPUBLICAN  
NATIONAL COMMITTEE**

Republican National Committee,  
[Proposed] Intervenor-Defendant.

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1 Intervenor—the Republican National Committee—now answers Plaintiff’s  
2 Complaint (Doc. 1, No. 2:22-cv-01003). Unless expressly admitted below, every  
3 allegation in the complaint is denied. Because Plaintiffs often cite nothing, Intervenor does  
4 not know whether the referenced factual material exists, is accurate, or is placed in proper  
5 context. Accordingly, Intervenor states:

- 6 1. This is a legal argument requiring no response.
- 7 2. This is a legal argument requiring no response.
- 8 3. The governor’s statement speaks for itself; the rest is a legal argument  
9 requiring no response.
- 10 4. Intervenor lacks sufficient information to admit or deny.
- 11 5. This is a legal argument requiring no response.
- 12 6. This is a legal argument requiring no response.
- 13 7. This is a legal argument requiring no response.
- 14 8. This is a legal argument requiring no response.
- 15 9. This is a legal argument requiring no response.

#### 16 **JURISDICTION AND VENUE**

- 17 10. This is a legal argument requiring no response.
- 18 11. This is a legal argument requiring no response.
- 19 12. This is a legal argument requiring no response.
- 20 13. Admit.
- 21 14. Admit.

#### 22 **PARTIES**

- 23 15. Intervenor lacks sufficient information to admit or deny.
- 24 16. Admit that Defendant Hobbs is the Arizona Secretary of State, sued in her  
25 official capacity; the rest is a legal argument requiring no response.
- 26 17. Admit that Defendant Brnovich is the Arizona Attorney General, sued in his  
27 official capacity; the rest is a legal argument requiring no response.
- 28 18. Admit the first sentence; the rest is is a legal argument requiring no response.





63. This is a legal argument requiring no response.

64. This is a legal argument requiring no response.

65. This is a legal argument requiring no response.

66. This is a legal argument requiring no response.

67. This is a legal argument requiring no response.

68. This is a legal argument requiring no response.

69. This is a legal argument requiring no response.

70. Deny.

71. This is a legal argument requiring no response.

72. This is a legal argument requiring no response.

73. This is a legal argument requiring no response.

**Count 2: Violation of Procedural Due Process as to Voter Registration Applicants Using the Federal Form Who Do Not Provide Documentary Proof of Citizenship, U.S. Const. Amend. XIV, 42 U.S.C. §1983**

74. Intervenor incorporates by reference the foregoing responses to Plaintiffs' allegations in paragraphs 1 through 61.

75. This is a legal argument requiring no response.

76. This is a legal argument requiring no response.

77. This is a legal argument requiring no response.

78. This is a legal argument requiring no response.

79. This is a legal argument requiring no response.

80. This is a legal argument requiring no response.

81. This is a legal argument requiring no response.

82. Deny as the first sentence; the rest is legal argument requiring no response.

83. This is a legal argument requiring no response.

84. Deny.

85. This is a legal argument requiring no response.

**Count 3: Violation of Procedural Due Process as to Voter Registration Applicants Who Fail to Provide Documentary Proof of Residence U.S. Const. Amend. XIV, 42 U.S.C. §1983**

86. Intervenor incorporates by reference the foregoing responses to Plaintiffs' allegations in paragraphs 1 through 61.

87. This is a legal argument requiring no response.

88. This is a legal argument requiring no response.

89. This is a legal argument requiring no response.

90. This is a legal argument requiring no response.

91. This is a legal argument requiring no response.

92. This is a legal argument requiring no response.

93. This is a legal argument requiring no response.

94. This is a legal argument requiring no response.

95. This is a legal argument requiring no response.

96. This is a legal argument requiring no response.

97. This is a legal argument requiring no response.

### **RESPONSE TO PRAYER FOR RELIEF**

Intervenor denies that Plaintiff is entitled to any relief.

### **AFFIRMATIVE DEFENSES**

1. The allegations in the complaint fail to state a claim.
2. Plaintiffs lack a cause of action for one or more of their claims.
3. Plaintiffs lack standing for one or more of their claims.
4. Plaintiffs' requested relief is barred by the *Purcell* principle.

Respectfully submitted on September \_\_, 2022.

By: /s/ James P. McGlone

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