|    | 1  |   |
|----|--|---|
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| 13 | *pro hac vice  |   |
| 14 | Attorneys for Proposed Intervenor-Defenda              | unts                                    |
| 15 | UNITED STATES DISTRICT COURT                           |   |
| 16 | DISTRICT OF ARIZONA                                    |   |
| 17 | Mi Familia Vota, et al.,                               |   |
| 18 | Plaintiffs,  | Case No: 2:22-cv-00509 (Lead case)      |
| 19 | v.   | Judge Susan R. Bolton                   |
| 20 | Katie Hobbs, et al.,                                   |   |
| 21 | Defendants,  |   |
| 22 | Republican National Committee,                         |   |
| 23 | [Proposed] Intervenor-Defendant.                       |   |
|    |  | Case No: 2:22-cv-01003 (Consol. Case)   |
| 24 | Poder Latinx, Plaintiff,                               | Judge Susan R. Bolton                   |
| 25 | v.   | [PROPOSED] ANSWER OF                    |
| 26 |  | [PROPOSED] INTERVENOR-                  |
| 27 | Katie Hobbs, et al.,  Defendants,                      | DEFENDANT REPUBLICAN NATIONAL COMMITTEE |
| 28 | Defendants,  | NATIONAL COMMITTEE                      |

| 1  | Interv   | venor—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 property |   |
| 5  | context. Acc   | cordingly, 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 argumen         |
| 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 he        |
| 25 | official capa  | city; the rest is a legal argument requiring no response.                       |
| 26 | 17.  | Admit that Defendant Brnovich is the Arizona Attorney General, sued in hi       |
| 27 | official capa  | city; the rest is a legal argument requiring no response.                       |

Admit the first sentence; the rest is is a legal argument requiring no response.

28

18.

19. Admit. 1 2 **BACKGROUND** 3 20. The cited statute speaks for itself. 4 21. Intervenor lacks sufficient information to admit or deny. 5 22. This is a legal argument requiring no response. 23. 6 Intervenor lacks sufficient information to admit or deny. 7 24. This is a legal argument requiring no response. 8 25. Denied as to the first sentence; the quoted statute speaks for itself; the rest is 9 a legal argument requiring no response. 10 26. This is a legal argument requiring no response. 11 27. The quoted statute speaks for itself; the rest is a legal argument requiring no 12 response. 13 28. The quoted statute speaks for itself; the rest is a legal argument requiring no 14 response. 15 29. The quoted statute speaks for itself; otherwise, this is a legal argument 16 requiring no response. 17 30. This is a legal argument requiring no response. 18 31. This is a legal argument requiring no response; otherwise, deny. 19 32. Governor Ducey's statements speak for themselves; the rest is a legal 20 argument requiring no response. 21 33. This is a legal argument requiring no response; denied as to the last sentence. 22 Deny. 34. 23 35. Deny. 24 36. Intervenor lacks sufficient information to admit or deny. 25 37. Intervenor lacks sufficient information to admit or deny. 26 38. Intervenor lacks sufficient information to admit or deny. 27 39. Intervenor lacks sufficient information to admit or deny. 28 40. Deny.

| 1  | 41.  | This is a legal argument requiring no response; otherwise, deny.                |
|----|--|---|
| 2  | 42.  | This is a legal argument requiring no response.                                 |
| 3  | 43.  | The quoted statute speaks for itself; Intervenor lacks sufficient information   |
| 4  | to admit or d  | eny the last sentence.  |
| 5  | 44.  | The quoted statute speaks for itself; the rest is a legal argument requiring no |
| 6  | response.  |   |
| 7  | 45.  | This is a legal argument requiring no response.                                 |
| 8  | 46.  | This is a legal argument requiring no response.                                 |
| 9  | 47.  | Intervenor lacks sufficient information to admit or deny.                       |
| 10 | 48.  | Intervenor lacks sufficient information to admit or deny.                       |
| 11 | 49.  | Intervenor lacks sufficient information to admit or deny.                       |
| 12 | 50.  | Deny.   |
| 13 | 51.  | Deny.   |
| 14 | 52.  | Deny.   |
| 15 | 53.  | Deny.   |
| 16 | 54.  | Deny.   |
| 17 | 55.  | Deny.   |
| 18 | 56.  | Deny.   |
| 19 | 57.  | Deny.   |
| 20 | 58.  | Intervenor lacks sufficient information to admit or deny.                       |
| 21 | 59.  | Deny.   |
| 22 | 60.  | Deny.   |
| 23 | 61.  | Deny.   |
| 24 |  | CLAIMS FOR RELIEF   |
| 25 | Count 1: Arbitrary and Disparate Treatment of Voter Registration Applicants Using the Federal Form and Currently Registered Voters U.S. Const. Amend. XIV, 42 U.S.C. §1983 |   |
| 26 |  |   |
| 27 | 62.  | Intervenor incorporates by reference all foregoing responses to Plaintiffs'     |
| 28 | allegations.   | intervenor incorporates by reference an foregoing responses to Figure 11        |
|    | i anogunons.   |   |

| 1  | 63.  | This is a legal argument requiring no response.   |
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| 2  | 64.  | This is a legal argument requiring no response.   |
| 3  | 65.  | This is a legal argument requiring no response.   |
| 4  | 66.  | This is a legal argument requiring no response.   |
| 5  | 67.  | This is a legal argument requiring no response.   |
| 6  | 68.  | This is a legal argument requiring no response.   |
| 7  | 69.  | This is a legal argument requiring no response.   |
| 8  | 70.  | Deny.   |
| 9  | 71.  | This is a legal argument requiring no response.   |
| 10 | 72.  | This is a legal argument requiring no response.   |
| 11 | 73.  | This is a legal argument requiring no response.   |
| 12 | Count 2: Violation of Procedural Due Process as to Voter Registration Applicants |   |
| 13 | Using the  | Federal Form Who Do Not Provide Documentary Proof of Citizenship, U.S. Const. Amend. XIV, 42 U.S.C. §1983 |
| 14 | 74.  | Intervenor incorporates by reference the foregoing responses to Plaintiffs                                |
| 15 |  | n paragraphs 1 through 61.  |
| 16 | 75.  | This is a legal argument requiring no response.   |
| 17 | 76.  | This is a legal argument requiring no response.   |
| 18 | 77.  | This is a legal argument requiring no response.   |
| 19 | 78.  | This is a legal argument requiring no response.   |
| 20 | 79.  | This is a legal argument requiring no response.   |
| 21 | 80.  | This is a legal argument requiring no response.   |
| 22 | 81.  | This is a legal argument requiring no response.   |
| 23 | 82.  | Deny as the first sentence; the rest is legal argument requiring no response.                             |
| 24 | 83.  | This is a legal argument requiring no response.   |
| 25 | 84.  | Deny.   |
| 26 | 85.  | This is a legal argument requiring no response.   |
| 27 |  | nt 3: Violation of Procedural Due Process as to Voter Registration  |
| 28 |  | pplicants Who Fail to Provide Documentary Proof of Residence<br>U.S. Const. Amend. XIV, 42 U.S.C. §1983   |

| 1      | 86.                                     | Intervenor incorporates by reference the foregoing responses to Plaintiff |  |
|--------|---|---|--|
| 2      | allegations in paragraphs 1 through 61. |   |  |
| 3      | 87.                                     | This is a legal argument requiring no response.                           |  |
| 4      | 88.                                     | This is a legal argument requiring no response.                           |  |
| 5      | 89.                                     | This is a legal argument requiring no response.                           |  |
| 6<br>7 | 90.                                     | This is a legal argument requiring no response.                           |  |
| 8      | 91.                                     | This is a legal argument requiring no response.                           |  |
|        | 92.                                     | This is a legal argument requiring no response.                           |  |
| 9      | 93.                                     | This is a legal argument requiring no response.                           |  |
| 10     | 94.                                     | This is a legal argument requiring no response.                           |  |
| 11     | 95.                                     | This is a legal argument requiring no response.                           |  |
| 12     | 96.                                     | This is a legal argument requiring no response.                           |  |
| 13     | 97.                                     | This is a legal argument requiring no response.                           |  |
| 14     |   | RESPONSE TO PRAYER FOR RELIEF   |  |
| 15     | Interv                                  | venor denies that Plaintiff is entitled to any relief.                    |  |
| 16     |   | AFFIRMATIVE DEFENSES  |  |
| 17     | 1.                                      | The allegations in the complaint fail to state a claim.                   |  |
| 18     | 2.                                      | Plaintiffs lack a cause of action for one or more of their claims.        |  |
| 19     | 3.                                      | Plaintiffs lack standing for one or more of their claims.                 |  |
| 20     | 4.                                      | Plaintiffs' requested relief is barred by the <i>Purcell</i> principle.   |  |
| 21     | Respectfully                            | submitted on September, 2022.   |  |
| 22     |   |   |  |
| 23     |   | By: /s/ James P. McGlone  |  |
| 24     |   | Tyler Green*  |  |
| 25     |   | Cameron T. Norris*  James P. McGlone*                                     |  |
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