

**THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

DR. DALE G. CALDWELL, in his official capacity as  
LIEUTENANT GOVERNOR and SECRETARY OF  
STATE of NEW JERSEY,

*Defendant.*

Case No. 3:26-cv-2025  
(ZNQ-JTQ)

**NOTICE OF  
MOTION  
TO INTERVENE**

MOTION DAY:  
April 6, 2026

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law and supporting declarations, the National Association for the Advancement of Colored People (“NAACP”), NAACP New Jersey State Conference (“NJ NAACP”), Salvation and Social Justice (“SandSJ”), AAPI New Jersey (“AAPI NJ”), Returning Citizens Support Group (“RCSG”), Association of Black Women Lawyers of New Jersey (“ABWL-NJ”), Garden State Bar Association (“GSBA”), New Jersey Muslim Lawyers Association (“NJMLA”), People’s Organization for Progress (“POP”), and Edwin Ortiz (“Mr. Ortiz”) (collectively, “Proposed Intervenor-Defendants”), through undersigned counsel, respectfully move to intervene before this Court, on a date and time to be designated by it, for an order permitting their intervention as defendants in this matter to defend their significant interests that stand to be impaired by this litigation.

- A. Proposed-Intervenor Defendants are entitled to intervene as a matter of right pursuant to Fed. R. Civ P. 24(a)(2). This motion is timely and Proposed Intervenor-Defendants have an interest in protecting their members and their own sensitive and personal data

from improper disclosure to the DOJ. The existing parties do not adequately represent the Proposed Intervenor-Defendants interests.

- B. Or, in the alternative, Proposed Intervenor-Defendants are permitted to intervene under Fed. Civ. P. 24(b)(1).
- C. Counsel for Proposed Intervenor-Defendants conferred with Plaintiff the United States and the New Jersey Office of the Attorney General (“NJOAG”). NJOAG takes no position on this Motion. Plaintiff did not respond.
- D. Counsel for Proposed Intervenor-Defendants also conferred with other entities who have sought to intervene, including the League of Women Voters New Jersey (“LWVNJ”), Latino Action Network (“LAN”), and Make the Road New Jersey (“MRNJ”). Their motions are pending and they do not oppose this motion.
- E. Moreover, pursuant to Rule 24(c), Proposed Intervenor-Defendants file a Proposed Answer attached to this Motion as the requisite proposed pleading.<sup>1</sup>

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Proposed Intervenor-Defendants rely on the supporting brief and the declarations of the NAACP, NJ NAACP, SandSJ, AAPI NJ, RCSG, ABWL-NJ, GSBA, NJMLA, POP, and Mr. Ortiz filed herewith. A proposed order is also submitted.

WHEREFORE, Proposed Intervenor-Defendants respectfully request that the Court grant their motion to intervene as a matter of right or, in the alternative, grant their motion under the standard for permissive intervention.

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<sup>1</sup> Proposed Intervenor-Defendants attach a Proposed Answer to comply with Rule 24(c) but intend to file a Rule 12(b) motion within the time period prescribed by the rule or pursuant to any schedule set forth by this Court following a determination on this application to intervene.

Dated: March 13, 2026

Respectfully Submitted,

/s/ CJ Griffin

**NEW JERSEY INSTITUTE FOR  
SOCIAL JUSTICE**

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*Counsel for Proposed Intervenor-  
Defendants*

*\*Admission to the District of New  
Jersey forthcoming*

*\*\*Pro hac vice application  
Forthcoming*

**CERTIFICATION OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served via the Court's ECF system on all counsel of record on March 13, 2026.

*/s/ CJ Griffin* \_\_\_\_\_  
CJ Griffin

Dated: March 13, 2026