

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA
PENSACOLA DIVISION

STATE OF FLORIDA AND THE
FLORIDA DEPARTMENT OF
STATE, ET AL.,

Plaintiffs,

v.

DEPARTMENT OF HOMELAND
SECURITY AND MARKWAYNE
MULLIN,

Defendants.

Case No. 3:24-cv-509-TKW-HTC

**LEAGUE OF WOMEN VOTERS' AND
ELECTRONIC PRIVACY INFORMATION CENTER'S
EMERGENCY MOTION TO INTERVENE**

League of Women Voters and Electronic Privacy Information Center (“Proposed Intervenors”) respectfully seek the Court’s leave to intervene in this action pursuant to Federal Rule of Civil Procedure 24. As set forth in the accompanying Memorandum of Law, Proposed Intervenors are entitled to intervene as of right under Rule 24(a) or, in the alternative, should be granted leave to intervene under Rule 24(b). This Motion is timely and satisfies all other prerequisites under Rule 24. Accordingly, pursuant to Rule 24(c), Proposed Intervenors seek leave to

intervene to defend their interests in the Eleventh Circuit by filing a notice of appeal. *See* Exhibit 1.¹

Additionally, Proposed Intervenor seek emergency relief under Local Rule 7.1(L) because, as the Court recently observed, there are currently two “contradictory” and “conflicting” orders regarding operation of the modified Systematic Verification for Alien Entitlements (“SAVE”) System, one of which was secured by Proposed Intervenor (among others) in *League of Women Voters v. DHS*, --- F. Supp. 3d ----, No. 25-cv-3501, 2026 WL 1784297 (D.D.C. June 22, 2026) (“*LWV*”). As the Court concluded there, continued operation of the modified SAVE system injures Proposed Intervenor’s members’ right to privacy, causes reputational injuries, see *id.* at *11, and injures their right to vote, *id.* at *15, and the LWV

¹ Proposed Intervenor do not understand Rule 24(c) to require an answer or motion to dismiss in these circumstances, especially where the underlying case has been dismissed and Proposed Intervenor seek leave to intervene for purposes of appealing the Court’s enforcement order. *See Piambino v. Bailey*, 757 F.2d 1112, 1121 (11th Cir. 1985) (rejecting “excessively technical” understanding of Rule 24(c) requirements where “[e]veryone knew the nature of [intervenor’s] substantive claims for relief”); *see also Loyd v. Alabama Dept. of Corrections*, 176 F.3d 1336, 1341 (11th Cir. 1999) (similar); *Nat. Res. Def. Council v. Serv.*, No. 16-cv-585, 2016 WL 5415127, at *5 (M.D. Fla. Sept. 28, 2016) (purpose of Rule 24(c) is “to put the other parties ‘on notice of the position, claim, and relief sought by the intervenor’” and “court has granted a motion to intervene when the motion, which is not accompanied by a pleading, clearly states an intervenor’s position”). In this case, “the motion to intervene . . . clearly spell[s] out [Proposed Intervenor’s] position” and “[a]ny additional ‘pleading’” would be “surplusage.” *Piambino*, 757 F.2d at 1121. Nevertheless, Proposed Intervenor attach a proposed Notice of Appeal to this filing. *See* Exhibit 1.

plaintiffs were also incurring procedural injuries to their rights under the Privacy Act and Administrative Procedure Act, *id.* at *18. Further, the Court has already recognized the emergency circumstances at-issue here. *See generally* ECF 45.

Dated: July 8, 2026

Respectfully submitted,

/s/ Lauren C. Bingham

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LOCAL RULE 7.1 CERTIFICATE OF COMPLIANCE

I hereby certify that I have complied with Local Rule 7.1(B). Counsel for proposed intervenors conferred with counsel for all parties on July 8, 2026, prior to filing. Counsel for Plaintiffs Florida, Iowa, Ohio, and Indiana all indicated that they oppose the Motion. Counsel for Defendants stated that the United States takes no position at this time.

/s/ Lauren C. Bingham

CERTIFICATE OF SERVICE

I hereby certify that on July 8, 2026, I electronically filed the foregoing document with the Clerk of the United States District Court for the Northern District of Florida through the CM/ECF system, which will serve a true and correct copy on all counsel of record who have consented to electronic service.

/s/ Lauren C. Bingham