

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

VICTIM RIGHTS LAW CENTER, et al.,

Plaintiffs,

v.

Elisabeth D. DEVOS, in her official capacity as
Secretary of the United States Department of
Education, et al.,

Defendant,

FOUNDATION FOR INDIVIDUAL
RIGHTS IN EDUCATION, INDEPENDENT
WOMEN'S LAW CENTER, SPEECH FIRST,
INC.,

[Proposed] Intervenor-Defendants.

Civil Action No. 1:20-cv-11104-WGY

MOTION TO INTERVENE AS DEFENDANTS

Movants—the Foundation for Individual Rights in Education, the Independent Women's Law Center, and Speech First, Inc.—respectfully ask to intervene as defendants in this case. As explained in the attached memorandum, Movants satisfy the criteria for both intervention of right and permissive intervention. Movants have also attached a proposed answer to the complaint. This Court should grant their motion.

Dated: July 21, 2020

/s/ Charles J. Cooper
Charles J. Cooper (pro hac vice forthcoming)
Brian W. Barnes (pro hac vice forthcoming)
Nicole J. Moss (pro hac vice forthcoming)
COOPER & KIRK, PLLC
1523 New Hampshire Ave., NW
Washington, D.C. 20036
(202) 220-9600
ccooper@cooperkirk.com
bbarnes@cooperkirk.com
nmoss@cooperkirk.com

*Counsel for Foundation for
Individual Rights in Education*

Respectfully submitted,

/s/ Patrick Strawbridge
Patrick Strawbridge
CONSOVOY MCCARTHY PLLC
Ten Post Office Square
8th Floor South, PMB #706
Boston, MA 02109
(617) 227-0548
patrick@consovoymccarthy.com

Cameron T. Norris (pro hac vice forthcoming)
Alexa R. Baltes (pro hac vice forthcoming)
CONSOVOY MCCARTHY PLLC
1600 Wilson Blvd., Ste. 700
Arlington, VA 22209
(703) 243-9423
cam@consovoymccarthy.com
lexi@consovoymccarthy.com

*Counsel for Speech First, Inc. and Independent
Women's Law Center*

CERTIFICATE OF CONFERENCE

I met and conferred with the parties about this motion. Defendant reserves the right to take a position after seeing the contents of this motion and its attachments. Plaintiffs oppose intervention of right and permissive intervention.

Dated: July 21, 2020

/s/ Patrick Strawbridge

CERTIFICATE OF SERVICE

I filed this motion and its attachments via ECF, which will electronically notify everyone who requires notice.

Dated: July 21, 2020

/s/ Patrick Strawbridge