

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION**

ROBERT FOSTER; KATIE LIGON; KIRBY
CARTER; JOHN T. WILLIAMS,

Plaintiffs,

vs.

THE STATE OF MISSISSIPPI; THE STATE
BOARD OF ELECTION COMMISSIONERS;
TATE REEVES, *in his official capacities as
Governor of the State of Mississippi and a
Member of the State Board of Election
Commissioners*; LYNN FITCH, *in her official
capacities as the Mississippi Attorney General
and a Member of the State Board of Election
Commissioners*; and MICHAEL WATSON, *in
his official capacities as the Mississippi Secretary
of State and a Member of the State Board of
Election Commissioners,*

Defendants.

**CIVIL ACTION NO.
3:26-CV-00181-SA-JMV**

**MOTION OF DESOTO COUNTY NAACP AND DELTA SIGMA THETA TO
INTERVENE AS DEFENDANTS**

The DeSoto County Branch of the National Association for the Advanced of Colored People (DeSoto County NAACP) and Delta Sigma Theta Sorority, Inc. (Delta Sigma Theta) (collectively, Proposed Intervenors) respectfully move to intervene as Defendants pursuant to Rule 24(a) of the Federal Rules of Civil Procedure or, in the alternative, pursuant to Rule 24(b).

As set forth more fully in the memorandum of law filed concurrently with this motion, Proposed Intervenors are entitled to intervention as of right because their motion is timely, they and their members have unique, protectable interests in the subject matter of the lawsuit which

will be threatened by the relief sought by Plaintiffs, and their interests may not be adequately represented by the existing defendants or the other proposed intervenor, Malenda Harris Meacham. Permissive intervention may also be granted because the motion is timely and Proposed Intervenors' participation, including their representation by counsel experienced in complex voting rights litigation in this District and the Southern District of Mississippi,¹ will aid in the development of the record and the resolution of the case.

A proposed answer to Plaintiffs' Complaint is attached to this Motion as Exhibit A. *See* Fed. R. Civ. P. 24(c). To prevent any delay or disruption to the Court's resolution of the pending motion for a preliminary injunction, a proposed memorandum in opposition to that motion is attached to this Motion as Exhibit B. Declarations supporting this Motion to Intervene are attached to this Motion as Exhibits C and D.

Proposed Intervenors have conferred with Plaintiffs and Defendants on the motion to intervene. Plaintiffs oppose the motion at this time; Defendants take no position on the Motion.

CONCLUSION

The Court should grant the Motion to Intervene as Defendants as of right, or in the alternative, via permissive intervention.

¹ In addition to the undersigned counsel, attorneys from the American Civil Liberties Union Voting Rights Project and the NAACP Legal Defense and Educational Fund, Inc. intend to move for admission *pro hac vice* to represent Proposed Intervenors.

Respectfully submitted,

Dated: July 16th, 2026

/s/ Joshua Tom

AMERICAN CIVIL LIBERTIES UNION
OF MISSISSIPPI FOUNDATION

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*Attorneys for Proposed Intervenor-Defendants
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Sorority, Inc.*

CERTIFICATE OF SERVICE

I, Joshua Tom, hereby certify that on July 16, 2026, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which sent notification of such filing to all parties on file with the Court.

/s/ Joshua Tom

Joshua Tom