

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

STATE OF MISSOURI, DAVID MASON,  
ANDREA MCCANN, JESSICA FISHER, and  
PHILLIP FISHER,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF  
COMMERCE, HOWARD W. LUTNICK in his  
official capacity as Secretary of Commerce,  
UNITED STATES CENSUS BUREAU, and  
GEORGE COOK in his official capacity as Acting  
Director of the U.S. Census Bureau,

Defendants.

Case No. 4:26-cv-00131 (JAR)

**MOTION TO INTERVENE AS DEFENDANTS BY  
NAACP, MISSOURI NAACP, SIREN, MIRA, H. VICTORIA MORGAN, GABE REISS,  
CARRIE NICOLAS, LUCIA ORNELAS, AND VERONICA ZAVALA**

National Association for the Advancement of Colored People (“NAACP”), National Association for the Advancement of Colored People Missouri State Conference (“Missouri NAACP”), Services, Immigrant Rights, and Education Network (“SIREN”), Massachusetts Immigrant and Refugee Advocacy Coalition (“MIRA”), H. Victoria Morgan, Gabe Reiss, Carrie Nicolas, Lucia Ornelas, and Veronica Zavala (collectively “Proposed Intervenors”) move to intervene in this matter as Defendants to defend their significant interests that stand to be impaired by this litigation. For the reasons discussed in the supporting memorandum filed alongside this motion, Proposed Intervenors are entitled to intervene in this case as a matter of right under Federal Rule of Civil Procedure 24(a)(2). In the alternative, Proposed Intervenors request permissive intervention under Rule 24(b). Pursuant to Rule 24(c), a Proposed Answer is also attached to this

Motion.<sup>1</sup>

**WHEREFORE**, Proposed Intervenors respectfully request that the Court grant their motion to intervene.

Dated: February 27, 2026

Respectfully submitted,

/s/ J. Andrew Hirth  
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*\*Pro hac vice applications forthcoming*

*Counsel for Proposed Intervenors*

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<sup>1</sup> Proposed Intervenors respectfully request leave to file a Rule 12(b) motion within the time period prescribed by the Federal Rules of Civil Procedure or pursuant to any schedule set by this Court.