IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

STATE OF SOUTH CAROLINA, Plaintiff, v. UNITED STATES OF AMERICA and ERIC H. HOLDER, JR., in his official capacity as Attorney General, Defendants, and JAMES DUBOSE, JUNIOR GLOVER, FAMILY UNIT, INC., BRENDA C. WILLIAMS, M.D., and AMANDA WOLF, Defendant-Intervenors, and LEAGUE OF WOMEN VOTERS OF SOUTH CAROLINA and CRAIG DEBOSE, Proposed Defendant-Intervenors.	Case No. 1:12-cv-203 (CKK, BMK, JDB)

AMENDMENT TO THE MOTION TO INTERVENE AS DEFENDANT
TO ADD CRAIG DEBOSE AS A DEFENDANT-INTERVENOR

The League of Women Voters of South Carolina (the "League") and Craig Debose (together, "Applicants") respectfully amend the League's pending Motion to Intervene as Defendant (Dkt. No. 19) to add Mr. Debose as a Defendant-Intervenor in this action pursuant to Fed. R. Civ. P. 24. Like the League, Mr. Debose is entitled to intervention as of right under Fed.

R. Civ. P. 24(a), or in the alternative, should be permitted to intervene under Fed. R. Civ. P. 24(b), for substantially the same reasons articulated in Applicants' Memorandum of Law in Support of Intervention (Dkt. No. 19-3, "Memorandum") as to the League.[1]

Mr. Debose is a bi-racial 63-year-old South Carolina resident who does not possess any of the forms of photo ID required by Act R54. Mr. Debose has made repeated attempts over the span of several years to obtain a South Carolina photo ID, but has been unable to do so. Mr. Debose knows his Social Security Number and is in possession of military discharge papers that document his Social Security Number, but he has lost his Social Security card. In his multiple attempts to obtain a photo ID, Mr. Debose has repeatedly been informed by the State of South Carolina that without his Social Security card, he cannot be issued a South Carolina photo ID. On the several occasions when Mr. Debose has attempted to obtain a Social Security card, he has been informed by the United States government that it cannot be issued without a state photo ID. Thus, despite making numerous attempts, Mr. Debose is unable to obtain a photo ID that would be acceptable under Act R54. Thus, Mr. Debose has a direct and substantial interest in the subject matter of this action. *See, e.g.*, *Nw. Austin Mun. Util Dist. No. One* v. *Holder*, 573 F. Supp. 2d 221, 230 (D.D.C. 2008) (noting that the court had previously granted multiple motions to intervene presented by minority voters). The same authority and reasoning articulated in the Memorandum (pp. 7-16) as to grounds for mandatory intervention and permissive intervention also support adding Mr. Debose as a Defendant-Intervenor. Mr.

[1] Pursuant to Local Civil Rule 7(m), the undersigned states that Applicants have conferred with Plaintiff's attorneys and have been informed that Plaintiff takes no position with respect to Applicants' Motion to Intervene. Counsel for the Applicants also conferred with the attorneys of Defendant-Intervenors James Dubose, Junior Glover, Family Unit, Inc.., Brenda C. Williams, M.D., and Amanda Wolf, who advised they do not oppose intervention, and with Defendants' attorneys, who advised that they take no position with respect to permissive intervention.

Debose hereby joins in the Proposed Answer filed with the League's pending Motion to Intervene (Dkt. No. 19-2).

For the above reasons and those set forth in Applicants' Memorandum of Law in Support of Intervention, the Court should permit Applicants to intervene in this action as defending parties.

Dated: April 3, 2012

Respectfully submitted,

/s/ Mark A. Posner

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CERTIFICATE OF SERVICE

I, Mark A. Posner, certify that on April 3, 2012, I filed and served the foregoing Amendment to the Motion to Intervene and a proposed order by emailing PDF copies of the same to the Clerk's Office (dcd_cmecf@dcd.uscourts.gov).