

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

CAMPAIGN LEGAL CENTER,

Plaintiff,

v.

FEDERAL ELECTION COMMISSION,

Defendants.

Civil Action No. 24-2585 (SLS)

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**LAST BEST PLACE PAC’S EXPEDITED MOTION TO INTERVENE AS DEFENDANT  
AND EMERGENCY REQUEST FOR A STAY**

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Pursuant to Federal Rule of Civil Procedure 24, Last Best Place PAC—the target of Plaintiff Campaign Legal Center’s underlying administrative complaint—respectfully moves to intervene in this case as of right or permissively so that it can protect its own interests, including preserving the ability to appeal from the Court’s June 26 Order against the FEC, ECF No. 21, as the FEC now lacks a quorum and can no longer appeal from it.

Last Best Place further joins the FEC’s request to stay this case pending the agency’s regaining of a quorum. *See* ECF No. 25. Alternatively, if the Court does not grant that request, Last Best Place moves for a stay of the July 28 deadline for the FEC to take conforming action until the Court rules on this intervention motion and, if intervention is granted, Last Best Place’s forthcoming motion for a stay of the judgment pending appeal. The Court has inherent authority to grant such a stay to allow for the orderly disposition of this matter. *Dietz v. Bouldin*, 579 U.S. 40, 45 (2016). And, as the FEC’s motion makes clear (*see* ECF No. 25 at 2), Campaign Legal Center is amenable to a 60-day extension of the compliance deadline—long enough to allow resolution of this intervention motion and full briefing on a stay pending appeal.

This motion is supported by the memorandum of law below and is accompanied by a proposed answer and a proposed order. Counsel to Campaign Legal Center have indicated that they oppose this motion. Counsel to the Federal Election Commission has indicated that it takes no position on this motion, except to note that it may be more appropriate for the Court to determine the Commission's motion to stay first.

Respectfully submitted,

/s/ David R. Fox

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