

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA**

RILEY GAINES, *et al.*,

Plaintiffs,

v.

NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION, *et al.*,

Defendants,

and

NATIONAL WOMEN’S LAW CENTER,

[Proposed] Intervenor-Defendant.

No. 1:24-cv-01109-MHC

May 6, 2024

**[PROPOSED] INTERVENOR-DEFENDANT NATIONAL WOMEN’S LAW
CENTER’S MOTION TO INTERVENE AS DEFENDANT**

Proposed Intervenor-Defendant National Women’s Law Center (“NWLC”) respectfully moves this Court for permissive intervention as a defendant pursuant to Federal Rule of Civil Procedure 24(b)(1). NWLC shows that the intervention is timely, its defense shares common questions of law and fact with the claims and defenses of the parties in this case, and the intervention will not unduly delay or prejudice the adjudication of the parties’ rights.

Accompanying this motion is a memorandum of law, a supporting declaration, and a proposed motion to dismiss pursuant to Rule 24(c).

Counsel for Proposed Intervenor-Defendant advised the parties' counsel of NWLC's intent to file a motion to intervene in this action. Counsel for Plaintiffs stated that they do not consent to the motion; counsel for Defendant National Collegiate Athletic Association stated that they take no position on the motion and thus do not oppose it; and counsel for the State Defendants¹ stated that they do not consent to the motion but do not oppose it.

Dated: May 6, 2024

Joshua A. Block*
Jennesa Calvo-Friedman*
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION
125 Broad Street, 18th Floor
New York, NY 10004
Phone: (212) 549-2569
jblock@aclu.org
jcalvo-friedman@aclu.org

Patrick J. Hayden*
Katelyn Kang*
Valeria M. Pelet del Toro*
COOLEY LLP
55 Hudson Yards
New York, NY 10001-2157
Phone: (212) 479-6000
phayden@cooley.com
kkang@cooley.com
vpeletdeltoro@cooley.com

/s/ Nneka Ewulonu
Nneka Ewulonu
Georgia Bar No. 373718
Cory Isaacson
Georgia Bar No. 983797
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION OF
GEORGIA, INC.
P.O. Box 570738
Atlanta, GA 30357
Phone: (770) 303-8111
newulonu@acluga.org
cisaacson@acluga.org

Kathleen R. Hartnett*
Zoë Helstrom*
COOLEY LLP
3 Embarcadero Center, 20th Floor
San Francisco, CA 94111
Phone: (415) 693-2000
khartnett@cooley.com
zhelstrom@cooley.com

¹ See ECF No. 31 at 1 & n.1 (listing State Defendants).

Elizabeth Reinhardt*
COOLEY LLP
1299 Pennsylvania Avenue, NW
Washington, DC 20004-2400
Phone: (202) 776-2353
ereinhardt@cooley.com

Celene Chen*
COOLEY LLP
500 Boylston Street, 14th Floor
Boston, MA 02116-3736
Phone: (617) 937-2305
celene.chen@cooley.com

Counsel for Intervenor-Defendant
**Pro hac vice pending*

RULE 7.1 CERTIFICATE OF COMPLIANCE WITH L.R. 5.1

Pursuant to Local Rule 7.1D, I hereby certify that this brief has been prepared in Times New Roman, 14-point font, one of the font and point selections approved by this Court in Local Rule 5.1C.

This 6th day of May, 2024.

/s/ Nneka Ewulonu
Nneka Ewulonu

CERTIFICATE OF SERVICE

I hereby certify that on this day, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of the filing to all counsel of record.

This 6th day of May, 2024.

/s/ Nneka Ewulonu
Nneka Ewulonu