

LEAVE TO FILE GRANTED

Ch. G. 4805
4/19/22

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL A. SUSSMANN,

Defendant,

Case No. 1:21-cr-00582 (CRC)

DEMOCRATIC NATIONAL COMMITTEE'S MOTION TO INTERVENE

The Democratic National Committee (the "DNC") respectfully moves this Honorable Court to intervene as an interested non-party to assert privilege claims over documents and information that the Government seeks to compel. As part of its motion to intervene, the DNC seeks to join in the motion made by Hillary for America ("HFA") and the DNC—attached to HFA's motion to intervene—for leave to file *ex parte* and under seal for the Court's *in camera* review the declaration of Marc E. Elias supporting Fusion GPS's opposition to the government's motion to compel.

In support of this motion, undersigned counsel submits the following:

The DNC is a non-party entity asserting attorney-client privilege and work product protection over communications and work product of its attorneys (at Perkins Coie) and their consultant (Fusion GPS). The government's pending motion to compel seeks materials in the possession of Fusion GPS and/or Perkins Coie that are protected by the attorney-client privilege

and the attorney work product doctrine. The DNC seeks to intervene to protect its privilege and the protection afforded to its attorneys' work product.

WHEREFORE, for the foregoing reasons and for any other reasons just and equitable, the DNC respectfully requests that the Court allow it to intervene as an interested non-party.

Dated: April 18, 2022

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that on April 18, 2022, I caused the foregoing to be filed and served via electronic mail upon all counsel of record.

By: 

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