

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION**

JACOB DOE

Plaintiff,

v.

No. 1:23-cv-00041

**THE UNIVERSITY OF NORTH
CAROLINA SYSTEM, et al.**

Defendants.

**ACLU OF NORTH CAROLINA LEGAL FOUNDATION,
FREEDOM OF THE PRESS FOUNDATION,
AND PROFESSOR EUGENE VOLOKH'S
JOINT MOTION TO INTERVENE**

The American Civil Liberties Union of North Carolina (ACLU-NCLF), Freedom of the Press Foundation (FPF), and Professor Eugene Volokh jointly move to intervene in the above-captioned case pursuant to Fed. R. Civ. P. 24(a)(2) and Fed. R. Civ. P. 24(b)(1)(B) for the limited purpose of filing a motion to unseal plaintiff's motion for the temporary restraining order (TRO) and preliminary injunction, this Court's order granting plaintiff's motion to seal, and any motions related to the merits of sealing of documents in this matter. Additionally, if this Court does

not dissolve the TRO that is currently in effect in this case (ECF No. 14), as requested by the parties on February 22, 2023, (ECF No. 15), proposed Intervenor request that they also be permitted to file their own motion to dissolve and modify the TRO insofar as it serves as a prior restraint and otherwise limits the speech of third-party media entities and other third parties.

Proposed Intervenor will contemporaneously file declarations and a memorandum in support of this motion which is incorporated herein. Proposed Intervenor's joint motion for unsealing and supporting memorandum are attached to this filing as Exhibits 4 and 5.

Pursuant to LCvR 7.1(b), proposed Intervenor informed counsel for the parties of their intent to file this motion on February 27th, 2023. As of this filing, the parties have not responded with their positions on this motion.

Respectfully submitted this 28th day of February 2023 by:

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**Counsel of record*

***Application for admission
forthcoming*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of this **MOTION TO INTERVENE** and attachments were this day filed in in the Western District of North Carolina using the Clerk’s CM/ECF system, which will send notification of this filing to counsel for the parties:

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