

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

COMMONWEALTH OF VIRGINIA,

Defendant.

Case No. 3:25-cv-01067

**MOTION TO INTERVENE, FOR EXTENSION OF TIME TO FILE PLEADING, AND
TO STAY ADJUDICATION OF JOINT MOTION FOR ENTRY OF CONSENT
JUDGMENT**

Pursuant to Federal Rule of Civil Procedure 24(a), the Dream Project, a Virginia-based non-profit, respectfully moves to intervene in this action as of right, to challenge the proposed joint consent decree and defend the validity of the challenged Virginia statutes. Alternatively, the Dream Project requests permissive intervention under Rule 24(b). Intervention is timely, necessary, and essential to ensure that the Court hears from the Dream Project before approving or enforcing a consent decree that will conclusively determine their rights. Given the unusual circumstances of these proceedings, the Dream Project also requests an extension to file pleadings required under Fed. R. Civ. P. 24(c) and asks that the Court delay consideration of the parties' Joint Motion, Dkt. 3, until the Dream Project's motion to intervene can be fully considered. The grounds for this motion are more fully set forth in the accompanying memorandum of law.

Date: December 31, 2025

Respectfully submitted,

/s/ Alex Kornya

Alexander Vincent Kornya (VSB#100878)

Angela Ciolfi (VSB #65337)

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CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of December, 2025, I filed a true and correct copy of the foregoing Motion to Intervene, For Extension of Time to File Pleadings, and to Stay Adjudication of Joint Motion for Entry of Consent Judgment, along with supporting memorandum and declaration, with the Clerk of the Court using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

/S/ Alex Kornya
Alexander Vincent Kornya (VSB #100878)