

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

END CITIZENS UNITED PAC,

Plaintiff,

v.

FEDERAL ELECTION COMMISSION,

Defendant,

and

NEW REPUBLICAN PAC,

Intervenor-Defendant.

Civil Action No. 1:21-cv-2128-RJL

**INTERVENOR-DEFENDANT'S
COMBINED RESPONSE IN
OPPOSITION TO PLAINTIFF'S
MOTION FOR DEFAULT JUDGMENT
OR, IN THE ALTERNATIVE,
SUMMARY JUDGMENT AND CROSS-
MOTION FOR SUMMARY JUDGMENT**

Pursuant to Federal Rule of Civil Procedure 56 and Local Rule 7(h), Intervenor-Defendant New Republican PAC respectfully opposes Plaintiff End Citizens United PAC's Motion for Default Judgment or, in the Alternative, Summary Judgment, ECF No. 23, and cross-moves for summary judgment.

This motion is supported by the accompanying Memorandum of Points and Authorities in Support of Intervenor-Defendant's Combined Opposition to Plaintiff's motion and Cross-Motion for summary judgment. A proposed Order is also attached.

Wherefore, Intervenor-Defendant respectfully requests that this Court deny Plaintiff's Motion for Default Judgment or, in the Alternative, Summary Judgment and grant Intervenor-Defendant's Cross-Motion for Summary Judgment.

Dated: January 18, 2022

/s/ Jason Torchinsky

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Attorneys for Intervenor-Defendant

CERTIFICATE OF SERVICE

I certify that on January 18, 2022, I served the foregoing on all counsel of record through this Court's CM/ECF system. I further certify that on January 19, 2022, I served the foregoing on the FEC by USPS First Class mail.

/s/ Jason Torchinsky