

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
KENTUCKY

United States of America v. Michael Adams, et al.

Adams · No. 3:26-cv-00019-GFVT · Decided April 14, 2026

SUMMARY

The United States District Court for the Eastern District of Kentucky grants motions to intervene filed by several organizations, individuals, and a county clerk in the United States’ action seeking Kentucky voter registration information. The court permits intervention under Federal Rule of Civil Procedure 24(b), finding the motions timely, presenting common questions of law, and causing no undue delay or prejudice.

CASE DETAILS

COURT	United States District Court for the Eastern District of Kentucky
WRITING FOR THE COURT	Gregory F. Van Tatenhove
JURISDICTION	United States District Court for the Eastern District of Kentucky
DECIDED	April 14, 2026
DOCKET	3:26-cv-00019-GFVT
DISPOSITION	other
PROCEDURAL POSTURE	Several organizations and individuals moved to intervene as defendants under Federal Rule of Civil Procedure 24(a), or alternatively under Rule 24(b), in the United States' action seeking declaratory and injunctive relief concerning Kentucky voter-registration information. The court granted permissive intervention under Rule 24(b).
STANDARD OF REVIEW	Permissive intervention under Federal Rule of Civil Procedure 24(b) is reviewed under the district court's sound discretion. The court considered timeliness, a common question of law or fact, undue delay, prejudice, and other relevant factors.
PRECEDENTIAL VALUE	unknown
PARTIES	United States of America v. Michael Adams, et al.

TOPICS

intervention

civil procedure

election administration

statutory interpretation

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QUESTIONS PRESENTED

1. Whether the proposed intervenors' motions were timely under Federal Rule of Civil Procedure 24(b).
2. Whether the proposed intervenors asserted claims or defenses sharing a common question of law or fact with the main action.
3. Whether permissive intervention would cause undue delay or prejudice to the original parties.
4. Whether the proposed intervenors were entitled to intervention as of right under Rule 24(a)(2).

HOLDINGS

1. The court did not decide entitlement to intervention as of right because permissive intervention was warranted under Rule 24(b).
2. A court may permit intervention when the motion is timely and the proposed intervenor has a claim or defense sharing a common question of law or fact with the main action; the court must then consider undue delay, prejudice, and other relevant factors.
3. The proposed intervenors' motions were timely.
4. The proposed intervenors asserted defenses sharing common questions of law with the main action.
5. Permissive intervention would not cause undue delay or prejudice to the original parties.

KEY QUOTATIONS

“As such, the Court will exercise its discretion to permit the Proposed Intervenors to intervene under Rule 24(b), as they have timely moved to intervene, present a defense that shares a common question of law with the main action, and no prejudice or undue delay will result.” (Section II)

FACTUAL BACKGROUND

The United States sought Kentucky's statewide voter-registration list, including personal information such as names, dates of birth, addresses, and driver's-license or partial Social Security numbers, invoking federal election statutes. Kentucky officials declined to provide the information or sign a proposed memorandum of understanding concerning privacy and data security. Organizations representing Kentucky voters and foreign-born residents, two individual Kentucky voters, and the Jefferson County Clerk sought intervention based on asserted interests in protecting voter information and complying with their legal duties.

PROCEDURAL HISTORY

The United States filed the action on February 26, 2026, after Kentucky officials declined to provide requested statewide voter-registration information. Proposed intervenors filed motions on March 2, March 6, and March 16, 2026. No answer had been filed, discovery had not begun, no scheduling order or trial date had been set, and

the motions were unopposed. The court granted all motions to intervene and directed the Clerk to file the proposed answers and motions to dismiss.

DISPOSITION

other

CASES CITED

- Franklin Cnty. v. Shelter Gen. Ins. Co., No. 3:08-cv-49-DCR, 2008 WL 4787399, at *2 (E.D. Ky. Oct. 30, 2008)
- Qualas Corp. v. Wilson, No. 1:23-cv-352, 2023 WL 5745438, at *3 (S.D. Ohio Sept. 6, 2023)
- Michigan State AFL-CIO v. Miller, 103 F.3d 1240, 1248 (6th Cir. 1997)
- United States v. Michigan, 424 F.3d 438, 445 (6th Cir. 2005)
- Purnell v. City of Akron, 925 F.2d 941, 951 (6th Cir. 1991)
- Horrigan v. Thompson, No. 96-4138, 1998 WL 246008, at *2 (6th Cir. May 7, 1998)
- Lake Inv. Dev. Grp. v. Egidi Dev. Grp., 715 F.2d 1256, 1258 (7th Cir. 1983)
- Appalachian Regional Healthcare v. Coventry Health and Life Ins. Co., No. 5:12-cv-114-KSF, 2013 WL 1314166, at *3 (E.D. Ky. Mar. 28, 2013)
- Bay Mills Indian Community v. Snyder, 2017 WL 7736934, at *4 (W.D. Mich. Mar. 8, 2017), *aff'd*, 720 F. App'x 754 (6th Cir. 2018)
- A.W. v. Red Roof Inns, Inc., 2023 WL 5029174, at *4 (S.D. Ohio Aug. 8, 2023)