

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

AMERICAN COUNCIL OF LIFE
INSURERS, et al.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
LABOR and JULIE SU, in her official
capacity as ACTING SECRETARY OF
LABOR,

Defendants.

Civil Action No. 4:24-cv-00482-O

UNOPPOSED MOTION TO INTERVENE AS PLAINTIFFS

The Financial Services Institute (“FSI”) and Securities Industry and Financial Markets Association (“SIFMA”) (collectively, “Intervenors”) move to intervene in this case under Federal Rule of Civil Procedure 24 to protect their members’ interests. Intervenors easily satisfy the requirements for intervention as of right under Rule 24(a)(2). As explained in Intervenors’ brief in support of this motion, Intervenors are entitled to intervene as of right because (i) their motion is timely; (ii) they have an indisputable interest in the subject matter of this case; (iii) their ability to protect that interest may be impaired by the disposition of this action; and (iv) their interests are not adequately represented by the existing Plaintiffs. Alternatively, permissive intervention under Rule 24(b) would be appropriate because Intervenors challenge the same rule, press the same claims, and make many of the same arguments as Plaintiffs here.

Respectfully submitted,

Dated: June 28, 2024

/s/ Russ Falconer

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Counsel for Plaintiffs-Intervenors FSI and SIFMA

CERTIFICATE OF SERVICE

I hereby certify that on June 28, 2024, a true and correct copy of the above and foregoing document has been served electronically using the CM/ECF system, which will subsequently send copies to all counsel of record registered to accept electronic service in this matter.

/s/ Russ Falconer

Russ Falconer

CERTIFICATE OF CONFERENCE

The undersigned counsel hereby certifies that he has complied with the meet-and-confer requirement in Local Rule CV-7(a)-(b), (h) and that the motion is **unopposed**.

/s/ Russ Falconer

Russ Falconer