

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

DO NO HARM,
Plaintiff,

v.

UNITED STATES DEPARTMENT OF HEALTH
AND HUMAN SERVICES *et al.*,
Defendants.

Case No. 1:26-cv-01062-LLA

PAPA OLA LŌKAHI'S MOTION TO INTERVENE

Pursuant to Federal Rule of Civil Procedure 24(a) and (b), Papa Ola Lōkahi respectfully moves to intervene as a matter of right or, alternatively, for permissive intervention as a defendant in the above-captioned case. Papa Ola Lōkahi satisfies all the criteria for intervention as a matter of right under Rule 24(a)(2). Papa Ola Lōkahi has Article III standing to defend the Scholarship Program, its motion to intervene is timely, and it has an unmistakable and unique interest in this case. Papa Ola Lōkahi's statutory responsibilities and organizational mission could be impaired by this case and no party to the action adequately represents Papa Ola Lōkahi's interests. Alternatively, Papa Ola Lōkahi meets the criteria for permissive intervention under Rule 24(b)(1)(B). This Court has subject matter jurisdiction, Papa Ola Lōkahi's motion is timely, it will raise defenses concerning the legal and factual allegations raised in the Complaint, and it will contribute significantly to the development of the underlying legal and factual issues in this case.

Consistent with Local Rule 7(m), counsel for Papa Ola Lōkahi has conferred with counsel for the parties to determine their clients' positions on this motion. Plaintiff Do No Harm does not oppose intervention as of right and takes no position on permissive intervention. Defendants the United States Department of Health and Human Services, United States Health

Resources and Services Administration, Secretary Robert F. Kennedy, Jr., and Thomas J. Engels stated they would review the anticipated motion to intervene once it was filed.

RESPECTFULLY SUBMITTED this 15th day of May, 2026.

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**pro hac vice* application forthcoming

**D.D.C. admission pending

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CERTIFICATE OF SERVICE

I certify that on this 15th day of May, 2026, pursuant to Local Civil Rule 5.4(d)(1), I electronically filed the foregoing document and its attachments with the Clerk of the Court for the United States District Court for the District of Columbia using the Court's CM/ECF system. I certify that Plaintiff's counsel is a registered CM/ECF user.

In addition, pursuant to Local Civil Rule 5.4(d)(2), I certify that on this 15th day of May, 2026, I caused true and correct copies of the foregoing document and its attachments to be served on Defendants' counsel by certified U.S. Mail, return receipt and email at the following addresses:

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