

STATE OF MINNESOTA  
SPECIAL REDISTRICTING PANEL

CO-01-160

---

Susan M. Zachman, Maryland Lucky R.  
Rosenbloom, Victor L.M. Gomez, Gregory G.  
Edeen, Jeffrey E. Karlson, Diana V. Brattie,  
Brian J. McClair and Gregory J. Ravenhorst,  
individually and on behalf of all citizens and  
voting residents of Minnesota similarly situated,

Plaintiffs,

v.

Mary Kiffmeyer, Secretary of State of Minnesota;  
and Doug Gruber, Wright County Auditor,  
individually and on behalf of all Minnesota  
county chief election officers,

Defendants.

**MOTION TO  
INTERVENE AS A  
DEFENDANT UNDER  
RULE 24**

---

TO: Plaintiffs and their attorneys, Best & Flanagan LLP and Thomas B. Heffelfinger, 400 U.S. Bank Place, 601 Second Avenue South, Minneapolis, MN 55402-4331, and Charles R. Shreffler, 2116 Second Avenue South, Minneapolis, MN 55404-2606; and Defendant Mary Kiffmeyer, Secretary of State and her attorney, Mar B. Levinger, Deputy Attorney General, 445 Minnesota Street, Suite 1100, St. Paul, MN 55101-2128; and Defendant Doug Gruber, Wright County Auditor, and his attorney, Brian J. Asleson, Chief Deputy Attorney, Wright County Attorney's Office, Ten Second Street, N.W., Buffalo, MN 55313:

**PLEASE TAKE NOTICE** that Congressman Martin Olav Sabo,

Congressman James L. Oberstar, Congressman William P. Luther, Congresswoman Betty McCullum, Minnesota Senate Majority Leader Senator Roger D. Moe, and Minnesota House Minority Leader Representative Thomas W. Pugh, hereby move for leave to intervene as

defendants in this action in order to assert defenses in an answer to be filed and served in accordance with a schedule to be promulgated by the Special Redistricting Panel and in order to oppose Plaintiffs' Notice of Motion and Motion for Entry of a Scheduling Order, pursuant to the Minnesota Rules of Civil Procedure, Rule 24.01, for the reason that the intervenors have an interest in the subject matter of this action, the legislative and Congressional redistricting of the State of Minnesota, and the plaintiffs' motion as a practical matter threatens to impair or impede the intervenors' interests in protecting their Constitutional right to Congressional and legislative redistricting in accordance with the legislative process, as more fully set forth in the Intervenors' Memorandum in Opposition to Plaintiffs' Motion for Entry of a Scheduling Order, which accompanies this motion.

FAEGRE & BENSON LLP

Dated: August 10, 2001.



---

John D. French, #31914  
Brian Melendz, #223633  
Lianne C. Knych, #0268896  
Kerry L. Bundy, #266917  
James W. Poradek, #290488  
2200 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402-3901  
(612) 766-7000

COUNSEL FOR THE INTERVENORS

M2:20403848.01