

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. Bratlie,
Brian J. LeClair and Gregory J. Ravenhorst,
individually and on behalf of all citizens
and voting residents of Minnesota
similarly situated,

Plaintiffs,

and

Jesse Ventura,

Plaintiff-Applicant Intervener,

**MOTION TO
INTERVENE**

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.

Plaintiff-Applicant Intervener Jesse Ventura ("Applicant"), pursuant to Rule 24 of the
Minnesota Rules of Civil Procedure, states as follows:

1. Applicant seeks intervention in the above-captioned action pursuant to Rule 24 of
the Minnesota Rules of Civil Procedure and will move the court for intervention as a matter of
right, or in the alternative, permissive intervention should any party object. Oral argument is
requested.
2. The nature of Applicant's claims and defenses as to which intervention is sought
and the reasons for the claim of entitlement to intervention are:

a. Applicant is a citizen and qualified voter of the United States and the state of Minnesota.

b. Pursuant to the Minnesota Constitution, Applicant plays an indispensable role in the state's redistricting process and, as the representative of the state as a polity, bears the responsibility of ensuring that any redistricting plan furthers the interests of the state and the people of Minnesota.

c. As an indispensable participant in the state's redistricting process, Applicant has substantial interests in the subject matter of the above-captioned action, which include:

i. That any congressional and legislative redistricting of the state of Minnesota be done in accordance with applicable constitutional and statutory standards;

ii. That any congressional and legislative redistricting of the state of Minnesota be done in accordance with traditional redistricting principles;

iii. That any congressional and legislative redistricting of the state of Minnesota be done to achieve political fairness or competitiveness, rather than to achieve only the interests of traditional political parties; and

iv. That any congressional and legislative redistricting of the state of Minnesota be done in furtherance of the constitutional rights of all Minnesota state citizens.

d. Without the ability to intervene, Applicant's ability to protect these interests may be impaired by the disposition of the above-captioned action.

e. Upon information and belief, Plaintiffs will not vigorously pursue or adequately represent Applicant's interests, particularly Applicant's interest in achieving a redistricting plan that achieves political fairness or competitiveness.

f. Applicant's intervention will neither unduly delay nor prejudice the adjudication of Plaintiffs' rights. Indeed, Applicant's participation in the above-captioned matter will aid the court in its inquiry by presenting a redistricting position that represents interests beyond traditional political interests and promotes political fairness or competitiveness among all state districts.

Dated: September 13, 2001

DORSEY & WHITNEY LLP

By Marianne D. Short
Marianne D. Short #100596
Michelle B. Frazier #285468
220 South Sixth Street, Suite 1300
Minneapolis, MN 55402-1498
Telephone: (612) 340-2600

Attorneys for Plaintiff-Applicant Intervener