

---

**STATE OF MINNESOTA  
SPECIAL REDISTRICT PANEL**

---

C0-01-160

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,

vs.

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.

---

**NOTICE OF OBJECTION  
TO INTERVENTION  
OF APPLICANT  
GOVERNOR JESSE VENTURA**

Plaintiffs, pursuant to Rule 24.03 of the Minnesota Rules of Civil Procedure, hereby give Notice of their objection to the proposed intervention by Applicant for Intervention Governor Jesse Ventura.

1. Applicant's motion is not proper under the Minnesota Rules of Civil Procedure for failure to include a pleading setting forth the bases for relief sought by Applicant. Because Applicant has not submitted a Complaint in Intervention, the Court and present parties cannot

determine whether any of Applicant's claims are consistent, inconsistent or common with or to those asserted by the present parties.

2. Applicant has no separate or cognizable right or interest in the subject matter of this action which is different from that of the existing parties. Applicant, by his Motion, alleges an interest in promoting political competitiveness and political fairness, which interest is not a legal claim.

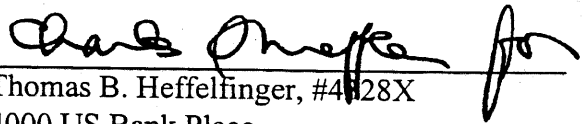
3. Applicant does not have standing in his capacity as governor to bring this action. Applicant as governor of the state should not be permitted to sue the Minnesota Secretary of State and place the state in the position of de facto suing itself.

4. The existing parties adequately represent Applicant's claimed interest.

5. Applicant's alleged claim of interest can be protected by a motion by Applicant to appear *amicus curiae*.

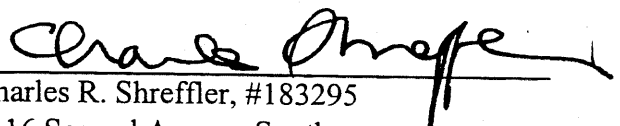
Dated: September 21, 2001

**BEST & FLANAGAN, LLP**

  
Thomas B. Heffelfinger, #4128X  
4000 US Bank Place  
601 Second Avenue South  
Minneapolis, MN 55402-4331  
(612) 339-7121

Dated: September 21, 2001

**SHREFFLER LAW FIRM, P.A.**

  
Charles R. Shreffler, #183295  
2116 Second Avenue South  
Minneapolis, MN 55404-2606  
(612) 872-8000

*Attorneys for Plaintiffs*