

**IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF ALABAMA**

STATE OF ALABAMA, and

MORRIS J. BROOKS, JR.,
Representative for Alabama’s 5th
Congressional District,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
COMMERCE; and WILBUR L. ROSS, in
his official capacity as Secretary of
Commerce

BUREAU OF THE CENSUS, an agency
within the United States Department of
Commerce; and RON S. JARMIN, in his
capacity as performing the non-exclusive
functions and duties of the Director of the
U.S. Census Bureau,

Defendants,

and

DIANA MARTINEZ; RAISA
SEQUEIRA; SAULO CORONA; IRVING
MEDINA; JOEY CARDENAS;
FLORINDA P. CHAVEZ; and
CHICANOS POR LA CAUSA

*Proposed Defendant-
Intervenors.*

Civil Action No. 2:18-cv-00772-RDP

**OPPOSED MOTION FOR LEAVE TO
INTERVENE**

MOTION FOR LEAVE TO INTERVENE

Proposed Defendant-Intervenors Diana Martinez, Raisa Sequeira, Saulo Corona, Irving Medina, Joey Cardenas, Florinda P. Chavez and Chicanos Por La Causa (collectively, “Proposed Defendant-Intervenors”), respectfully request that the Court grant them leave to intervene as defendants in this action as of right pursuant to Federal Rule of Civil Procedure 24(a)(2) or, in

the alternative, grant them permissive intervention pursuant to Federal Rule of Civil Procedure 24(b)(1)(B). As detailed in the Declaration of Andrea Senteno, counsel for the Proposed Defendant-Intervenors contacted parties' counsel to determine if parties' counsel will oppose the motion. Prior to the filing on this motion, counsel for the Proposed Defendant-Intervenors was informed that Plaintiff State of Alabama would oppose to motion for leave to intervene.

In support of this Motion, Proposed Defendant-Intervenors rely on and incorporate herein their Memorandum of Law in Support, the Declaration of Andrea Senteno, and Proposed Defendant-Intervenors' Answer to the Complaint, attached as Exhibit A to this Motion, to comply with Federal Rule of Civil Procedure 24(c).

Dated: July 12, 2018

Respectfully Submitted,

/s/ Edward Still

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**Pro Hac Vice* Applications Forthcoming
Counsel for Proposed Defendant-Intervenors

CERTIFICATE OF SERVICE

I hereby certify that on July 12, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participant:

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/s/ Edward Still

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