

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN**

RUTH JOHNSON, TERRI LYNN LAND, and
MARIAN SHERIDAN,

Plaintiffs,

v.

JOCELYN BENSON, Secretary of the State of
Michigan, in her official capacity,

Defendant,

MICHIGAN ALLIANCE FOR RETIRED
AMERICANS, DETROIT/DOWNRIVER
CHAPTER OF THE A. PHILIP RANDOLPH
INSTITUTE, CHARLES ROBINSON, GERARD
MCMURRAN, and JIM PEDERSEN’S

Proposed-Intervenor
Defendants.

Case No. 1:20-CV-00948

MICHIGAN ALLIANCE FOR
RETIRED AMERICANS,
DETROIT/DOWNRIVER CHAPTER
OF THE A. PHILIP RANDOLPH
INSTITUTE, CHARLES ROBINSON,
GERARD MCMURRAN, AND JIM
PEDERSEN’S MOTION TO
INTERVENE AS DEFENDANTS

**EXPEDITED CONSIDERATION
REQUESTED**

Plaintiffs Michigan Alliance for Retired Americans, Detroit/Downriver Chapter of the A. Philip Randolph Institute, Charles Robinson, Gerard McMurrin, and Jim Pedersen (collectively “Proposed Intervenor”) seek to participate as intervening defendants in the above-captioned lawsuit to safeguard the substantial and distinct legal interests of Proposed Intervenor, which will otherwise be inadequately represented in the litigation. For the reasons discussed in the memorandum in support, filed concurrently herewith, Proposed Intervenor are entitled to intervene in this case as a matter of right under Federal Rule of Civil Procedure 24(a)(2). In the alternative, Proposed Intervenor request permissive intervention pursuant to Rule 24(b).

Proposed Intervenor requested expedited consideration of this motion. Proposed Intervenor therefore respectfully request that the Court set an expedited schedule regarding their motion to intervene, to allow for briefing and a decision on this motion to intervene so that

Proposed Intervenor may respond to the pending motion for preliminary injunction by October 13 and participate in the hearing on October 20. Otherwise, Proposed Intervenor's substantial constitutional rights are at risk of being irreparably harmed, as described more fully Proposed Intervenor memorandum in support of this motion.

WHEREFORE, Proposed Intervenor request that the Court grant them leave to intervene in the above-captioned matter and to file its proposed Answer.

Dated: October 2, 2020

Respectfully submitted,

s/ Sarah Prescott

Sarah S. Prescott (P70510)
Attorney for Plaintiffs
105 E. Main Street
Northville, MI 48167
Telephone: 248.679.8711
prescott@sppplaw.com

Marc E. Elias (DC #442007)*
Uzoma N. Nkwonta (DC #975323)*
Courtney A. Elgart (DC #1645065)*
Jyoti Jasrasaria (DC #1671527)*
Stephanie Command (NY #5547807)*
PERKINS COIE LLP
Attorneys for Plaintiffs
700 Thirteenth Street NW, Suite 800
Washington, DC 20005
Telephone: 202.654.6200
MElias@perkinscoie.com
UNkwonta@perkinscoie.com
CElgart@perkinscoie.com
JJasrasaria@perkinscoie.com
SCommand@perkinscoie.com

Reina Almon-Griffin (WA #54651)*
PERKINS COIE LLP
Attorney for Plaintiffs
1201 Third Avenue, Suite 4900
Seattle, WA 98101
Telephone: 206.359.8000
RALmon-Griffin@perkinscoie.com

Danielle Sivalingam (Serbin) (CA #
294369)*
PERKINS COIE LLP
Attorney for Plaintiffs
1888 Century Park East, Suite 1700
Century City, California 90067
Telephone: 310.788.9900
DSivalingam@perkinscoie.com

*Attorneys for Proposed Intervenor-
Defendants*

**Admission to W.D. Mich. forthcoming*

CERTIFICATE OF SERVICE

Sarah Prescott certifies that on the 2nd day of October 2020, they served a copy of the above document in this matter on all counsel of record and parties via ecf filing and e-mail.

s/ Sarah Prescott

Sarah S. Prescott (P70510)
Attorney for Plaintiffs
105 E. Main Street
Northville, MI 48167
Telephone: 248.679.8711
prescott@sppplaw.com