

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

STATE OF SOUTH CAROLINA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
UNITED STATES OF AMERICA and ERIC	)	
H. HOLDER, JR., Attorney General of the	)	
United States,	)	
	)	No. 1:12-cv-00203-CKK-BMK-JDB
Defendants,	)	
	)	
and	)	
	)	
JAMES DUBOSE, JUNIOR GLOVER,	)	
FAMILY UNIT, INC., BRENDA C.	)	
WILLIAMS, M.D., and AMANDA WOLF,	)	
	)	
<u>Applicants for Intervention.</u>	)	

MOTION FOR LEAVE TO INTERVENE AS DEFENDANTS

James Dubose, Junior Glover, Family Unit, Inc., Brenda C. Williams, M.D., and Amanda Wolf hereby move the Court for leave to intervene as defendants in this action as of right pursuant to Rule 24(a)(2), F.R. Civ. P, or alternatively to intervene permissibly pursuant to Rule 24(b)(1)(B), F.R. Civ. P. The individual applicants are residents and registered voters of the State of South Carolina. Applicants Dubose, Glover, and Williams are members of racial minorities. Applicant Wolf is Caucasian.

As stated in the attached memorandum in support of this motion, applicants claim an interest in the property or transaction that is the subject of this action and are so situated that disposing of the action may as a practical matter impair or impede their ability to protect their

interest. Applicants further allege that their interest is not adequately represented by existing parties and, therefore, the Court should allow them to intervene as of right pursuant to Fed. R. Civ. P. 24(a)(2).

In the alternative, applicants request the Court grant them permissive intervention pursuant to Rule 24(b)(1)(B), F.R. Civ. P., on the ground that they have a claim or defense that shares with the main action a common question of law or fact.

If intervention is granted, applicants will: (i) participate in the action on the schedule that will be established for the existing parties; (ii) avoid unnecessary delays or duplication of efforts in areas satisfactorily addressed and represented by the existing Defendants, to the extent possible; and (iii) coordinate all future proceedings with the existing Defendants to the extent possible.

This motion is also accompanied by applicants' proposed answer setting forth the claims and defenses for which intervention is sought.

WHEREFORE, applicants request that their Motion for Leave to Intervene as Defendants be granted.

Respectfully submitted,

/s/ Arthur B. Spitzer

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