

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

GREEN PARTY OF CONNECTICUT, ET AL.,	:	CASE NO. 3:06-CV-01030 (SRU)
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
JEFFREY GARFIELD, ET AL.,	:	
	:	
Defendants.	:	OCTOBER 17, 2006

**PROPOSED INTERVENORS-DEFENDANTS'
MOTION TO INTERVENE**

Proposed Intervenor-Defendants Audrey Blondin, Esq., Kim Hynes, Tom Sevigny, Connecticut Common Cause and Connecticut Citizens Action Group respectfully move this Court, pursuant to Rule 24 of the Federal Rules of Civil Procedure, for an order granting intervention of right because: (1) the application is timely; (2) the applicants have an interest relating to the property or transaction that is the subject of the action; (3) disposition of the action as a practical matter may impede or impair the applicant's ability to protect that interest; and (4) no existing party adequately represents the applicant's interest. Fed. R. Civ. P. 24(a)(2); *See Brennan v. New York City Bd. of Educ.*, 260 F.3d 123, 128 n. 3 (2d Cir. 2001). In the alternative, Proposed Intervenor-Defendants request that an order granting permissive intervention be granted to allow resolution of the questions of fact and law that this defense has in common with the main case. Fed. R. Civ. P. 24(b)(2).

This motion is supported by Proposed Intervenor-Defendants' Memorandum of Law in Support of Proposed Intervenor-Defendants' Motion to Intervene, which has Declarations of Audrey Blondin, Esq., Kim Hynes, Tom Sevigny, Charles A. Sauer, and

ORAL ARGUMENT REQUESTED

Phillip Sherwood attached to it as Exhibits A, B, C, D, and E, respectively. Also accompanying this motion is Proposed Intervenor-Defendants' Answer, which Proposed Intervenor-Defendants request that the Court allow to be filed upon granting intervention. If permitted to intervene in the case, Proposed Intervenor-Defendants will be prepared to file a response to Plaintiffs' Motion for Preliminary Injunction by the due date that the Court sets for Defendants, and additionally abide by other related deadlines.

Respectfully submitted,

CONNECTICUT COMMON CAUSE,
CONNECTICUT CITIZENS ACTION GROUP,
KIM HYNES, AUDREY BLONDIN, AND
TOM SEVIGNY

/s/

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