

**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**

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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

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

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**CERTIFICATE OF SERVICE**

Sarah Prescott certifies that on the 2<sup>nd</sup> 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*

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