

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF ANOKA

TENTH JUDICIAL DISTRICT

Minnesota Voters Alliance; Mary Amlaw; Ken
Wendling; Tim Kirk,

Case Type: Other Civil
File No. 02-CV-23-3416

The Honorable Thomas R. Lehmann

Petitioners,

v.

NOTICE OF INTERVENTION

Tom Hunt, in his official capacity as elections
official for Anoka County; Steve Simon, in his
official capacity as Secretary of State; Anoka
County; the Office of the Minnesota Secretary
of State; Shannon Reimann, in her official
capacity as chief executive of the Minnesota
Correctional Facility – Lino Lakes,

Respondents,

Jennifer Schroeder, an individual; and Elizer
Darris, an individual,

[Proposed] Intervenor-
Respondents.

TO: Petitioners above-named and their counsel, Douglas P. Seaton, James V.F. Dickey, Upper
Midwest Law Center, 8421 Wayzata Blvd., Suite 300, Golden Valley, Minnesota 55426,
doug.seaton@umlc.org, james.dickey@umlc.org

Respondents Tom Hunt and Anoka County, above-named and their counsel, Assistant
Anoka County Attorney Jason Stover, 2100 3rd Avenue, Suite 720, Anoka, MN 55303

Respondents Steve Simon and Shannon Reimann, above-named and their counsel,
Assistant Attorneys General Nathan Hartshorn and Allen Barr, 445 Minnesota Street,
Suite 1400, St. Paul, MN 55101

PLEASE TAKE NOTICE that Jennifer Schroeder and Elizer Darris (“**Voter**

Intervenors”) request leave to intervene as Respondents in the above-captioned matter under

Minnesota Rules of Civil Procedure 24.01 and 24.02. This notice of intervention is timely.

This Notice of Intervention is accompanied by a pleading, in the form of an Answer to Petitioners' Petition for a Writ of Quo Warranto or, in the Alternative, for a Declaratory Judgment, setting forth the reasons for the Voter Intervenors' claim of entitlement to intervention and the nature and extent of the defenses for which intervention is sought.

Please be advised that pursuant to Rule 24.03, in the absence of an objection by one of the existing parties within thirty (30) days after service of this Notice, Voter Intervenors' intervention will be deemed accomplished. In the event of an objection, as directed under Minn. R. Civ. P. 24.03, the Voter Intervenors will move the Court for leave to intervene in this action. Petitioners' counsel has agreed to accept service of this Notice on behalf of Petitioners and has stated Petitioners' intention to object to intervention.

Please be further advised that, on or before July 28, 2023, the Voter Intervenors will move the Court for leave to file a motion for judgment on the pleadings and a motion to intervene. Voter Intervenors will further seek leave to participate in the August 24, 2023 hearing scheduled by the Court.

Dated July 19, 2023

/s/ Craig S. Coleman

Craig S. Coleman (MN #0325491)
Jeffrey P. Justman (MN #0390413)
Evelyn Snyder (MN #0397134)
Erica Abshez Moran (MN #0400606)
FAEGRE DRINKER BIDDLE & REATH LLP
2200 Wells Fargo Center
90 South Seventh Street
Minneapolis, MN 55402
Phone: (612) 766-7000
craig.coleman@faegredrinker.com
jeff.justman@faegredrinker.com
evie.snyder@faegredrinker.com
erica.moran@faegredrinker.com

Ehren M. Fournier (MN #0403248)
FAEGRE DRINKER BIDDLE & REATH LLP
320 South Canal Street, Suite 3300
Chicago, IL 60606
Phone: (312) 569-1000
ehren.fournier@faegredrinker.com

-and-

Teresa J. Nelson (MN #0269736)
David P. McKinney (MN #0392361)
AMERICAN CIVIL LIBERTIES UNION OF
MINNESOTA
2828 University Avenue SE, Suite 160
Minneapolis, MN 55414
Phone: (651) 645-4097
tnelson@aclu-mn.org
dmckinney@aclu-mn.org

*Attorneys for Intervenor-Respondents Jennifer
Schroeder and Elizer Darris*