

STATE OF MINNESOTA  
IN SUPREME COURT

A21-0243  
A21-0546

---



Peter S. Wattson, Joseph Mansky,  
Nancy B. Greenwood, Mary E.  
Kupper, Douglas W. Backstrom and  
James E. Hougas III, individually and  
on behalf of fall citizens and voting  
residents of Minnesota similarly  
situated,

Petitioners,

and

Dr. Bruce Corrie, Shelly Diaz,  
Alberder Gillespie, Xiongpao Lee,  
Abdirizak Mahboub, Aida Simon,  
Beatriz Winters, Common Cause,  
OneMinnesota.org, and Voices for  
Racial Justice,

Intervention Petitioners,

vs.

Steve Simon, in his official capacity as  
Minnesota Secretary of State,

Respondents,

**NOTICE OF MOTION AND  
MOTION TO INTERVENE**

---

Frank Sachs; Dagny Heimisdottir;  
Michael Arulfo; Tanwi Prigge; Jennifer  
Guertin; Garrison O'Keith McMurtrey;  
Mara Lee Glubka; Jeffrey Strand;  
Danielle Main; and Wayne Grimmer,

Petitioners,

and

Dr. Bruce Corrie, Shelly Diaz,  
Alberder Gillespie, Xiongpao Lee,  
Abdirizak Mahboub, Aida Simon,  
Beatriz Winters, Common Cause,  
OneMinnesota.org, and Voices for  
Racial Justice,

Intervention Petitioners,

vs.

Steve Simon, Secretary of State of  
Minnesota,

Respondent.

---

TO: All parties of record and proposed intervenors, by and through their  
counsel.

### **NOTICE OF MOTION**

PLEASE TAKE NOTICE that at a date at time to be determined by the  
Special Redistricting Panel in this consolidated action, the Intervention  
Petitioners – Dr. Bruce Corrie, Shelly Diaz, Alberder Gillespie, Xiongpao Lee,  
Abdirizak Mahboub, Aida Simon, Beatriz Winters, Common

Cause, OneMinnesota.org, and Voices for Racial Justice – will move the Panel for an order granting their Motion to Intervene under Rule 24 of the Minnesota Rules of Civil Procedure.

### **MOTION**

Intervention Petitioners – Dr. Bruce Corrie, Shelly Diaz, Alberder Gillespie, Xiongpao Lee, Abdirizak Mahboub, Aida Simon, Beatriz Winter, Common Cause, OneMinnesota.org, and Voices for Racial Justice – respectfully move the Special Redistricting Panel in this consolidated action for an order granting their Motion to Intervene under Rule 24 of the Minnesota Rules of Civil Procedure. This Motion is based on all of the files and proceedings herein, including the Intervention Petition and Memorandum of Law filed in support of this Motion.

Respectfully submitted,

LATHROP GPM LLP

Dated: July 15, 2021

By /s/Brian A. Dillon  
Brian A. Dillon (MN #0386643)  
Amy Erickson (MN # 0399214)  
80 South Eighth Street  
500 IDS Center  
Minneapolis, MN 55402  
Phone: 612-632-3000  
brian.dillon@lathropgpm.com  
amy.erickson@lathropgpm.com

*Attorneys for Dr. Bruce Corrie, Shelly Diaz,  
Alberder Gillespie, Xiongpaoo Lee, Abdirizak  
Mahboub, Aida Simon, Beatriz Winters,  
Common Cause, OneMinnesota.org, and Voices  
for Racial Justice*

## ACKNOWLEDGMENT

The parties through their undersigned counsel, hereby acknowledges that sanctions may be imposed for a violation of Minn. Stat. § 549.211, subd. 2 pursuant to Minn. Stat. § 549.211, subd. 3.

LATHROP GPM LLP

Dated: July 15, 2021

By /s/Brian A. Dillon  
Brian A. Dillon (MN #0386643)  
Amy Erickson (MN # 0399214)  
80 South Eighth Street  
500 IDS Center  
Minneapolis, MN 55402  
Phone: 612-632-3000  
brian.dillon@lathropgpm.com  
amy.erickson@lathropgpm.com

*Attorneys for Dr. Bruce Corrie, Shelly Diaz,  
Alberder Gillespie, Xiongpaoo Lee, Abdirizak  
Mahboub, Aida Simon, Beatriz Winters,  
Common Cause, OneMinnesota.org, and Voices  
for Racial Justice*

47202843v1