

STATE OF MINNESOTA
SPECIAL REDISTRICTING PANEL

A21-0243
A21-0546

FILED

September 3, 2021

OFFICE OF
APPELLATE COURTS

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

Plaintiffs,

and

Paul Anderson, Ida Lano, Chuck Brusven, Karen Lane,
Joel Hineman, Carol Wegner, and Daniel Schonhardt,

Plaintiff-Intervenors,

vs.

Steve Simon, Secretary of State of Minnesota; and
Kendra Olson, Carver County Elections and Licensing
Manager, individually and on behalf of all Minnesota
county chief election officers,

Defendants,

**NOTICE OF MOTION AND
APPLICATION TO
INTERVENE
BY PROPOSED DATA
SCIENCE INTERVENORS**

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

Plaintiffs,

and

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

Plaintiff-Intervenors,

vs.

Steve Simon, Secretary of State of Minnesota,

Defendant.

- TO: Defendant Steve Simon, Secretary of State of Minnesota, and his Attorneys Nathan J. Hartshorn and Angela Behrens, Minnesota Attorney General's Office, 445 Minnesota Street, Suite 1400, St. Paul, MN 55101-2134; and
- TO: Defendant Kendra Olson, Carver County Elections and Licensing Manager, and her Attorney Jennifer K. Tichey, Carver County Attorney's Office, 604 East 4th Street, Chaska, MN 55318; and
- TO: Plaintiffs Peter S. Wattson, Joseph Mansky, Nancy B. Greenwood, Mary E. Kupper, Douglas W. Backstrom, James E. Hougas, III, and League of Women Voters Minnesota, and their Attorneys James H. Gilbert, Adam L. Sienkowski, and Jody E. Nahlovsky, James H. Gilbert Law Group P.L.L.C., 12700 Anderson Lakes Parkway, Eden Prairie, MN 55344; and
- TO: Plaintiff-Intervenors Paul Anderson, Ida Lano, Chuck Brusven, Karen Lane, Joel Hineman, Carol Wegner, and Daniel Schonhardt, and their Attorneys Elizabeth M. Brama, Maren M. Forde, and Samuel N. Louwagie, Taft Stettinius & Hollister LLP, 2200 IDS Center, 80 South 8th Street, Minneapolis, MN 55402; and
- TO: Plaintiffs Frank Sachs, Dagny Heimisdottir, Michael Arulfo, Tanwi Prigge, Jennifer Guertin, Garrison O'Keith McMurtrey, Mara Lee Glubka, Jeffrey Strand, Danielle Main, and Wayne Grimmer, and their Attorneys Charles N. Nauen, David J. Zoll, Kristen G. Marttila, and Rachel A. Kitze Collins, Lockridge Grindal Nauen P.L.L.P., 100 Washington Avenue South, Suite 2200, Minneapolis, MN 55401-2159; and Marc. E. Elias, Aria C. Branch, Daniel C. Osher, Jyoti Jasrasaria, Perkins Coie LLP, 700 Thirteenth Street NW, Suite 600, Washington, D.C. 20005-3960, and Abha Khanna and Jonathan P. Hawley, Perkins Coie LLP, 1201 Third Avenue, Suite 4900, Seattle, WA 98101-3099; and
- TO: Plaintiff-Intervenors Dr. Bruce Corrie, Shelly Diaz, Alberder Gillespie, Xiongpaoo Lee, Abdirazak Mahboub, Aida Simon, Beatriz Winters, Common Cause, OneMinnesota.org, and Voices for Racial Justice, and their Attorneys Brian A. Dillon and Amy Erickson, Lathrop GPM, 80 South Eighth Street, 500 IDS Center, Minneapolis, MN 55402.

PLEASE TAKE NOTICE THAT Karen Saxe, Paul Zorn, Deanna Haunsperger, Stephen Kennedy, Stephen Polasky, Victor Reiner, Brianna Heggeseth, Lisa Lendway, Shilad Sen, David Van Riper, Jonathan Schroeder, and Tracy Kugler (collectively, the "Proposed Data Science Intervenors") hereby move the Panel for an Order granting them intervention as additional Plaintiffs to fully participate in the above-captioned proceedings. This Motion and Application is based on Minnesota Rule of Civil Procedure 24 and the attached Memorandum of Law in Support of Motion and Application to Intervene by the Proposed Data Science Intervenors, along with the

accompanying Proposed Complaint in Intervention. The Proposed Data Science Intervenors have also served a Notice of Proposed Intervention under Minnesota Rule of Civil Procedure 24.03.

Dated: September 3, 2021

Respectfully submitted,

BASSFORD REMELE, P.A.

By: /s/ Lewis A. Remele

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ACKNOWLEDGMENT REQUIRED UNDER MINN. STAT. § 549.211, SUBD. 1

The undersigned hereby acknowledges that sanctions may be imposed under Minn. Stat. § 549.211, if factual contentions and legal arguments contained in this motion are unwarranted or presented for an improper purpose or are lacking in evidentiary support.

Dated: September 3, 2021

By: /s/ Lewis A. Remele
Lewis A. Remele (#90724)