

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE OF PENNSYLVANIA

SPC STEVEN REITZ, et al.,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	1:04-CV-02360
	:	Judge Kane
THE HONORABLE EDWARD	:	
G. RENDELL et al.,	:	
	:	[Filed Electronically]
Defendants.	:	

MOTION FOR LEAVE TO INTERVENE BY
THE REPUBLICAN STATE COMMITTEE
AND ALAN NOVACK, CHAIRMAN

The Republican State Committee and its Chairman, Alan Novack, hereby move this Court for an order allowing them to intervene in this proceeding as Plaintiffs as provided in Fed. R. Civ. P. 24. As is more fully set forth in the accompanying complaint, the applicants for intervention claim interests relating to transactions which are the subject of this action and the disposition of this action may, as a practical matter, impair or impede the applicant's ability to protect their interests. Applicants, therefore, are entitled to intervene as of right under Fed. R. Civ. P. 24(a). In the alternative, applicants should be permitted to intervene under

Fed. R. Civ. P. 24(b). Applicants' claims and this action have questions of law and fact in common. A proposed form of order is attached.

Respectfully submitted,

October 29, 2004

s/ David R. Overstreet
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CERTIFICATE OF SERVICE

I certify that, on October 29, 2004, I caused a copy of the foregoing Motion for Leave to Intervene to be served upon the following by hand delivery:

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s/ David R. Overstreet
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CERTIFICATE OF CONCURRENCE

I hereby certify that, pursuant to L.R. 7.1, I sought the concurrence of all parties to the foregoing Motion for Leave to Intervene.

Plaintiffs, by their counsel, concur.

Counsel for The Honorable Edward G. Rendell has not yet responded to the request for concurrence.

Counsel for The Honorable Pedro Cortés has not yet responded to the request for concurrence.

s/ David R. Overstreet
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