

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION**

John B. Curley, as Chairman of the Lake County,
Indiana, Republican Central Committee, and as a
registered voter, and Jim B. Brown as member of
the Lake County Board of Elections and
Registration and as a registered voter,

Plaintiffs,

v.

Case No. 2:08 cv-00287-JVB

Lake County Board of Elections and Registration,
and the Honorable Thomas Philpot, not
individually but as Lake County Clerk,

Defendants.

Linda Peterson, Roosevelt Phillips, Mary Aaron,
Service Employees International Union, and
Indiana State Conference of National Association
for the Advancement of Colored People Branches,

Intervenor-Defendants.

INTERVENOR-DEFENDANTS' MOTION TO REMAND

Intervenor-Defendants Linda Peterson, Roosevelt Phillips, Mary Aaron, Service
Employees International Union, and Indiana State Conference of National Association for the
Advancement of Colored People Branches, hereby move this Court to remand this case to state
court.

Intervenor-Defendants make this motion on the grounds that (1) Plaintiffs lack Article III
standing, and (2) removal is not proper under 28 U.S.C. §1443(2). The grounds for the motion
are more fully explained in the accompanying memorandum.

WHEREFORE, Intervenor-Defendants request that this Court remand this case to state court.

Dated: October 7, 2008

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of October, 2008, a copy of the foregoing Motion To Remand was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to the following counsel of record. Parties may access this filing through the Court's system:

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I also certify that on the 7th day of October, 2008, a copy of the foregoing was served by first class United States Mail, postage prepaid, upon the following counsel of record:

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