## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ALABAMA SOUTHERN DIVISION

)

) )

)

) )

)

)

STATE OF ALABAMA, *et al.*, Plaintiffs, v. UNITED STATES DEPARTMENT OF COMMERCE, *et al.*, Defendants.

Case No. 2:18-cv-00772-RDP

## **DEFENDANTS' RESPONSE TO MOTIONS TO INTERVENE**

Defendants United States Department of Commerce, Wilbur L. Ross, Bureau of the Census, and Ron S. Jarmin ("Defendants"), through their undersigned counsel, hereby respond to the motions to intervene that were filed by Diana Martinez, Raisa Sequeira, Saulo Corona, Irving Medina, Joey Cardenas, Florinda P. Chavez, and Chicanos Por La Causa (Dkt. No. 6) (collectively, "MALDEF Applicants") and by the County of Santa Clara, King County, and the City of San Jose (Dkt. No. 9) (collectively, "Municipal Applicants"), as follows:

Defendants take no position one way or another regarding the motions to intervene filed by the MALDEF Applicants and the Municipal Applicants. Dated: July 20, 2018

Respectfully submitted,

CHAD A. READLER Acting Assistant Attorney General

BRETT M. SHUMATE Deputy Assistant Attorney General

JOHN R. GRIFFITHS Director, Federal Programs Branch

CARLOTTA P. WELLS Assistant Branch Director

/s/ Brad P. Rosenberg BRAD P. ROSENBERG (DC Bar #467513) Senior Trial Counsel United States Department of Justice Civil Division, Federal Programs Branch 20 Massachusetts Ave., N.W. Washington, DC 20530 Tel.: (202) 514-3374 Fax: (202) 616-8460 Email: brad.rosenberg@usdoj.gov

Counsel for Defendants

## **CERTIFICATE OF SERVICE**

I hereby certify that on July 20, 2018, I electronically filed the foregoing with the Clerk

of the Court using the CM/ECF system which will send notification of such filing to the

following:

## For Plaintiff:

Brad A. Chynoweth	bchynoweth@ago.state.al.us
Eric Michael Palmer	mnewman@ago.state.al.us
James W. Davis	jimdavis@ago.state.al.us
Steven Troy Marshall	smarshall@ago.state.al.us
Winfield J. Sinclair	wsinclair@ago.state.al.us

For Proposed Intervenor-Defendants:

James U. Blacksher	jblacksher@ns.sympatico.ca
W. Edward Still	Still@votelaw.com
Anil A. Mujumdar	anil@zarzaur.com

I also hereby certify that I have mailed by United States Postal Service the document to

the following non-CM/ECF participant:

Morris J. Brooks, Jr. 2101 W. Clinton Ave. Suite 302 Huntsville, AL 35805

> <u>/s/Brad P. Rosenberg</u> BRAD P. ROSENBERG (DC Bar #467513) Senior Trial Counsel United States Department of Justice Civil Division, Federal Programs Branch 20 Massachusetts Ave., N.W. Washington, DC 20530 Tel.: (202) 514-3374 Fax: (202) 616-8460 Email: <u>brad.rosenberg@usdoj.gov</u>

Counsel for Defendants