

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF IDAHO**

THE IDAHO REPUBLICAN PARTY, *et al.*,

Case No. 1:08-cv-00165-BLW

Plaintiffs,

vs.

BEN YSURSA, in his Official Capacity as  
Secretary of State of the State of Idaho,

Defendants.

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**MOTION FOR INTERVENTION AS DEFENDANTS-INTERVENORS  
PURSUANT TO F.R.C.P. RULE 24**

The following respectfully move this Court for an order, pursuant to F.R.C.P. Rule 24 granting them intervention as of right, or alternatively, by permission as defendants in this action: Mitch Campbell, John Haight, Andrew Logsdon, Launa Noble, LaMar Orton, Boyd Stokes, and Laura Pike Campbell of Twin Falls, Idaho; Calvin Leman of Salmon; Barbara Nelson and Jason Ramsey of Filer, Idaho; Joseph Britton of Jerome, Idaho; the American Independent Movement of Idaho, LLC (“AIM”); and the Committee for a Unified Independent Party, Inc. (“CUIP”).

1. As is set forth more fully in the declaration of Mitch Campbell, submitted herewith, the individual proposed defendants-intervenors are citizens of the state of Idaho and registered voters who are not aligned with a political party and do not wish to be. They identify themselves as independents.

2. As is set forth more fully in the declaration of Mitch Campbell, submitted herewith, AIM is an organization representing independent voters in the State of Idaho.

3. As is set forth more fully in the declaration of Jacqueline Salit, submitted herewith, CUIP is a national organization representing the interests of independent voters.

4. Submitted with this motion is an application to admit attorney Harry Kresky of New York to the U.S. District Court for the District of Idaho *pro hac vice*.

5. This motion is timely as defendants' answer has not been filed.

**WHEREFORE**, it is requested that the instant motion be granted.

DATED this 1<sup>st</sup> day of July, 2008.

/s/ Gary G. Allen

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/s/ Harry Kresky

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Attorneys for Defendants-Intervenors THE COMMITTEE FOR A UNITED INDEPENDENT PARTY, INC.; the AMERICAN INDEPENDENT MOVEMENT OF IDAHO; its Chairman MITCH CAMPBELL; JOHN HAIGHT; CALVIN LEMAN; ANDREW LOGSDON; BARBARA NELSON; LAUNA NOBLE; LaMAR ORTON; JASON RAMSEY; BOYD STOKES; LAURA PIKE CAMPBELL and JOSEPH BRITTON

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 1<sup>st</sup> day of July, 2008, I submitted this foregoing to the Clerk of the Court for service on CM/ECF Registered Participants as reflected on the Notice of Electronic Filing, including, but not limited to, the following:

John Eric Sutton	<a href="mailto:jesutton@jesutton.com">jesutton@jesutton.com</a>
Charles Crawford Crafts	<a href="mailto:idaholitigator@yahoo.com">idaholitigator@yahoo.com</a>

/s/ Gary G. Allen  
Gary G. Allen