

DONNA ZIEGLER [142415]
County Counsel
By: ANDREA WEDDLE [250297]
Assistant County Counsel
RAYMOND S. LARA [213181]
Senior Deputy County Counsel
Office of the County Counsel, County of Alameda
1221 Oak Street, Suite 450
Oakland, California 94612
Telephone: (510) 272-6700

Attorneys for Defendant
Tim Dupuis, Registrar of Voters for
The County of Alameda

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

VOTING RIGHTS DEFENSE PROJECT, *et al.*,

Plaintiffs,

v.

ALEX PADILLA, *et al.*,

Defendants.

Case No. C 16-02739 WHA

**DEFENDANT TIM DUPUIS' NOTICE OF
JOINDER AND JOINDER IN DEFENDANT
SECRETARY OF STATE'S NOTICE OF
MOTION AND MOTION TO DISMISS
FIRST AMENDED COMPLAINT**

Complaint filed: May 20, 2016
Date: August 18, 2016
Time: 8:00 a.m.
Department: 8
Judge: Hon. William Alsup

**NOTICE OF JOINDER AND JOINDER BY DEFENDANT TIM DUPUIS IN THE NOTICE OF
MOTION AND MOTION TO DISMISS FILED BY SECRETARY OF STATE ALEX PADILLA**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that Defendant Tim Dupuis ("Dupuis"), Registrar of Voters for the County of Alameda, hereby joins in the Secretary of State's Notice of Motion and Motion to Dismiss First Amended Complaint ("Motion") filed by Defendant Alex Padilla, the Secretary of State for the State of California ("Padilla"), on June 14, 2016 (ECF Docket No. 48). Federal courts recognize the right to join in motions filed by other parties. *See, e.g., Willis v. Pacific Maritime Ass'n*, C 95-4379, 1997 WL 488581, at *6-7 (N.D. Cal. Aug. 10, 1997) ("It is a common occurrence for parties to join in the motions of other parties on the same side in a case [and] [i]f the grounds stated in the motion are applicable to the joining party as well as the moving party, it would be wasteful for them to file separate motions."). Dupuis joins in and adopts the Motion in its entirety, including all arguments, assertions and authorities in the Motion and supporting papers. Dupuis further requests that any relief ordered by this Court relative to the Motion be ordered in favor of Dupuis as well.

DATED: June 15, 2016

DONNA ZIEGLER, County Counsel in and for
the County of Alameda, State of California

By /s/ Raymond S. Lara
Raymond S. Lara
Senior Deputy County Counsel
Attorneys for Tim Dupuis, the
Registrar of Voters For
the County of Alameda