

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF BAKER

ELKHORN BAPTIST CHURCH, An
Oregon Non-Profit Corporation, *et al.*,

Plaintiffs,

v.

KATHERINE BROWN, Governor of
the State of Oregon; and DOES 1
THROUGH 50, Inclusive,

Defendants.

Case No. 20CV17482

PROPOSED INTERVENORS' MOTION
TO INTERVENE

Pursuant to ORCP 33, Proposed Intervenor-Plaintiffs Bill Harvey, Sam Palmer, Sheriff Glenn Palmer, Jerry Shaw, Matthew R. Cunningham, Donald A. Jay, Jacob A. Brown, Samuel N. Brown, Virginia Stegemiller, B. David Hurley, and Douglass W. Hills, move to intervene as Intervenor-Plaintiffs to assert the claims set forth in the proposed Intervention Complaint, a copy of which is attached. The proposed Intervention Complaint contains the affidavits of the Proposed Intervenor-Plaintiffs (hereinafter "Intervenor").

///
///
///

POINTS AND AUTHORITIES

The attached Proposed Intervenor’s Complaint and Intervenor-Plaintiffs’ Memorandum of Points and Authorities establishes that Intervenor’s wish to present questions of fact and law which are in common, and are part of the same transaction or occurrence, with those of Plaintiffs as presented in the Plaintiffs’ Complaint, as Amended. Intervenor’s cannot anticipate any way that their intervention will unduly delay or prejudice the adjudication of the rights of the original parties to the above-captioned matter. Thus, all these points considered, the court should grant this Motion to Intervene.

DATED: May 12, 2020.

Kevin L. Mannix

Kevin L. Mannix, OSB No. 742021
Of Attorney for Intervenor-Plaintiffs
Kevin L. Mannix, P.C.
2009 State Street
Salem, OR 97301
P: (503) 364-1913
F: (503) 362-0513
kevin@mannixlawfirm.com

Trial Attorney: Kevin L. Mannix