

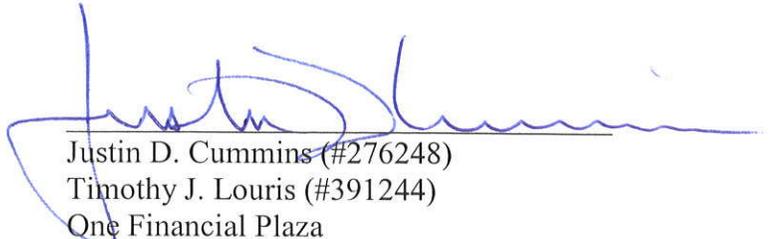
receiving care will probably either quit their jobs and risk becoming homeless or leave their children alone or in unsafe environments so the parents can work. In short, the disposition of the above-captioned matter – absent intervention – may impair the ability of SEIU Local 284 Kids First MN, Sharon Born, Terry Bicknell, and Rebecca Hall to protect their interests. See, e.g., Halverson ex rel. Halverson v. Taflin, 617 N.W.2d 448 (Minn. Ct. App. 2000) (permitting intervention under Rule 24.01).

SEIU Local 284 Kids First MN, Sharon Born, Terry Bicknell, and Rebecca Hall should also be allowed to intervene, pursuant to Rule 24.02, because their claims present both questions of law and of fact common to the claims of Minnesota Attorney General Lori Swanson and Governor Mark Dayton. See, e.g., Snyder’s Drug St., Inc. v. Minnesota St. Bd. of Pharm., 221 N.W.2d 162 (Minn. 1974) (allowing intervention under Rule 24.02). In addition, the proposed intervention will not unduly delay or prejudice the adjudication of the existing parties’ rights. Moreover, the Minnesota Attorney General does not object to the requested intervention and, indeed, her Petition in the above-captioned matter notes that the childcare services at issue here were designated as a core function in connection with the government shutdown in 2005.

Absent objection by an existing party within 30 days after service of this Notice of Intervention, the intervention by SEIU Local 284 Kids First MN, Sharon Born, Terry Bicknell, and Rebecca Hall will be deemed accomplished under Minn. R. Civ. P. 24.03. In the event of a timely objection, SEIU Local 284 Kids First MN, Sharon Born, Terry Bicknell, and Rebecca Hall will move the Court for leave to intervene in this action and to assert claims and arguments outlined in the Proposed Petition. Pursuant to Rule 24.03, SEIU Local 284 Kids First MN, Sharon Born, Terry Bicknell, and Rebecca Hall have filed and served their Proposed Petition with their Notice of Intervention.

Dated: June 22, 2011

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