

**Julaine Appling, Jo Egelhoff,
Jaren E. Hiller, Richard Kessenich,
and Edmund L. Webster,**

Plaintiffs,

vs.

**James E. Doyle, Karen Timberlake,
and John Kiesow,**

Defendants.

Case No. 2010 CV 004434

Case Code: 30701, 30704

Honorable Daniel R. Moeser

And

**Katharina Heyning, Judith Trampf,
Wendy Woodruff, Mary Woodruff,
Jayne Dunnum, Robin Timm,
Virginia Wolf, Carol Schumacher,
Diane Schermann, and Michelle Collins,**

Proposed Intervening
Defendants

**NOTICE OF MOTION AND MOTION OF PROPOSED INTERVENING
DEFENDANTS FOR LEAVE TO INTERVENE**

Please take notice that the Proposed Intervening Defendants, Katharina Heyning, Judith Trampf, Wendy Woodruff, Mary Woodruff, Jayne Dunnum, Robin Timm, Virginia Wolf, Carol Schumacher, Diane Schermann, and Michelle Collins, will bring the above motion on for hearing before the Honorable Daniel R. Moeser, Circuit Judge, on a date and time to be set by the Court.

This Motion for Leave to Intervene is based on the provisions of Wis. Stat. § 803.09(1), and the brief and supporting affidavits filed herewith. The brief and affidavits show

that the Proposed Intervening Defendants meet the requirements of Wis. Stat. . § 803.09(1) for intervention as a matter of right in that:

- 1) This motion was made in a timely fashion;
- 2) The Proposed Intervening Defendants have an interest sufficiently related to the subject of this action;
- 3) The Proposed Intervening Defendants are so situated that the disposition of this action may as a practical matter impair or impede their ability to protect that interest; and
- 4) The Proposed Intervening Defendants interest is not adequately represented by the existing parties.

In the alternative, the Proposed Intervening Defendants ask that they be permitted to intervene pursuant to Wis. Stat. 803.09(2) because their interest may be significantly impaired by this action.

Dated this 1st day of October, 2010.

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* motion for admission *pro hac vice*
pending