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6
7 IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MARION

8 KA'ILA FARRELL-SMITH; ROWENA)	
JACKSON; SARAH WESTOVER; and)	CASE NO. 21CV47809
9 ROSEMARY FRANCIS EATHERINGTON,)	
)	PROPOSED INTERVENORS'
10 Plaintiffs,)	MOTION TO INTERVENE
)	
11 v.)	
)	
12 THE OREGON DEPARTMENT OF JUSTICE;)	
ELLEN ROSENBLUM, in her official capacity)	
13 as the Attorney General of the State of Oregon;)	
and MICHAEL SLAUSON, in his official capacity)	
14 as Chief Counsel of the Criminal Justice Division)	
of the Oregon Department of Justice,)	
15)	
Defendants.)	
16)	

17 1. Pursuant to ORCP 33, Rogue Climate and 350EUG (hereinafter "350 Eugene"),
18 proposed intervenors, move to intervene as intervenor-plaintiffs, to assert the claims set forth in
19 the proposed complaint, a copy of which is attached as Exhibit 1 to this motion.

20 **POINTS AND AUTHORITIES**

21 2. The attached Proposed Intervenors' Complaint demonstrates that Intervenors
22 wish to present questions of fact and law which are in common, and are part of the same
23 transaction or occurrence, with those of Plaintiffs as presented in the Plaintiffs' Complaint.

1 Intervenor are not aware of any way that their intervention will unduly delay or prejudice the
2 adjudication of the rights of the original parties to the above-captioned matter. Thus, all these
3 points considered, the court should grant this Motion to Intervene.

4 Respectfully submitted November 16, 2022,

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