UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

CHASE CANTRELL; MELINDA NESTOR, by and through her Mother and Next Friend, KAREN NESTOR; CHIDIMMA UCHE, by and through her Mother and Next Friend, PAULA UCHE; JOSHUA KAY; SHELDON JOHNSON; MATTHEW COUNTRYMAN; BRYON MAXEY; RACHEL QUINN; KEVIN GAINES; DANA CHRISTENSEN; TONIESHA JONES, by and through her Guardian and Next Friend, CATHY ALFARO; SEGER WEISBERG, by and through his Father and Next Friend, MICHAEL WEISBERG; JAY ROBINSON, by and through his Father and Next Friend, MATTHEW ROBINSON; CASEY R. KASPER; SERGIO EDUARDO MUNOZ; ROSARIO CEBALLO; KATHLEEN CANNING; EDWARD KIM; and MARK C. CARTER, II, by and through his Mother and Next Friend, CAROLYN CARTER,

Plaintiffs,

v

JENNIFER GRANHOLM, in her Official Capacity as Governor of the State of Michigan,

Defendant.

No. 2:06-cv-15637

HON. DAVID M. LAWSON

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ATTORNEY GENERAL MICHAEL A. COX'S
MOTION TO INTERVENE AS A DEFENDANT

NOW COMES Attorney General Michael A. Cox, by his attorneys, Margaret A. Nelson, Heather S. Meingast, and Joseph E. Potchen, Assistant Attorneys General, and in support of his motion to intervene states as follows:

1. On December 19, 2006, Plaintiffs, which include applicants to the University of Michigan (U of M), students attending U of M, and current U of M faculty, filed a complaint challenging to newly adopted art 1, § 26 of the Michigan Constitution which became effective on December 23, 2006.

2. The only Defendant is Governor Jennifer Granholm, in her official capacity. On December 27, 2006, counsel for Defendant Granholm filed their appearances in this matter.

3. The Complaint asserts an equal protection challenge under the federal constitution and seeks a declaration that art 1, § 26 does not bar existing U of M admission polices and practices. (Complaint ¶ 7).

4. In the complaint, Plaintiffs reference a now dismissed cross-claim filed in another case challenging art 1, § 26 that is currently pending before this Court. *Coalition to Defend Affirmative Action, et al, v Granholm, et al.* (Case No. 2:06-cv-15024, ED Mich) (BAMN lawsuit).

5. In the BAMN lawsuit, on December 11, 2006, the Regents of the University of Michigan, the Michigan State University Board of Trustees, and the Wayne State University Board of Governors (Universities) filed a cross-claim asserting a violation of the Universities' alleged First Amendment right of academic freedom to admit a class that best meets their academic goals during the current admissions cycle. The Universities requested a judgment declaring that under federal law they may continue to use their existing admissions and financial

aid policies through the end of the current cycle, and otherwise declaring their rights and responsibilities under art 1 § 26 in light of federal law.

6. On December 11, 2006, Governor Granholm formally requested that the Attorney General provide her with legal representation in the BAMN lawsuit as provided for by the state constitution and statutes.[1] Recognizing a potential legal conflict because of the differing political positions taken by the Governor and the Attorney General on Proposal 2, now Const 1963, art 1, § 26, Governor Granholm requested the creation of a conflict wall to assure the independence of her assigned legal team.

7. In acknowledgement of a legal conflict, and pursuant to the Governor's request, the Attorney General assigned an independent team of Assistant Attorneys General and established a conflict wall in the BAMN lawsuit.

8. On December 14, 2006, the Attorney General filed a motion to intervene in the BAMN lawsuit and sought an expedited hearing on the motion. Governor Granholm did not oppose the Attorney General's intervention in the BAMN lawsuit. Similarly, she does not oppose the Attorney General's intervention in this matter.

9. On December 14, 2006, this Court granted the Attorney General's motion to intervene. (Exhibit 1).

10. Recognizing the unique situation confronting the Universities in their admissions processes that began as early as July 2006, and in fairness to the student applicants whose choices and applications were made well in advance of the adoption of art 1 § 26, the Attorney General agreed that the equities weighed in favor of a narrowly drawn six month temporary

[1] See Const 1963, art 5, §§ 3, 21; MCL 14.28.

injunction. This is what, in the Attorney General's opinion, distinguished the injunctive request on the Universities cross-claim from all other issues, such as contracting and hiring. This decision was also strategic in that any stipulated injunctive relief was dependent upon dismissal of the Universities' cross claim.

11. On December 18, 2006, the Universities, the Governor, and the Attorney General agreed to the entry of a temporary injunction that would enjoin the application of § 26 to the Universities regarding the current admissions and financial aid cycles, and would expire no later than 12:01 a.m., July 1, 2007. The Universities also agreed to dismiss their cross-claim filed against Governor Granholm in its entirety, with prejudice as to the injunctive relief. The parties in the BAMN lawsuit filed their stipulated agreement with this Court.

12. On December 19, 2006, the same day that the Complaint in this case was filed, this Court entered an order granting the injunction and dismissing the cross-claim as stipulated to by the parties in the BAMN lawsuit.

13. Since Plaintiffs in this case intend to raise the same or similar challenges to art 1 § 26 as in the BAMN lawsuit and/or the dismissed cross-claim, these unique circumstances compel the Attorney General to seek leave to intervene in this matter in order to ensure that the Court is presented with the full range of arguments on the questions presented, and so that a vigorous defense of the constitutionality of § 26 may be had.

14. The Attorney General, as the state’s chief law enforcement officer, has not only a duty to ensure that the laws of the State are followed, but also a duty to defend those laws as enacted by the Legislature, or, as in this case, by the People of Michigan themselves when those

laws are challenged.[2] Concomitant with those duties is the Attorney General's right under Michigan law to intervene in any matter to protect state interests.[3]

15. The Attorney General thus has a substantial legal interest in this matter relating to his duty to defend the constitutionality of § 26 on behalf of the State of Michigan, which interest will not be adequately represented through Governor Granholm's participation in this suit alone.

16. The Attorney General should thus be allowed to intervene as a matter of right in this case under FR Civ P 24(a) to ensure that the State's interests are adequately presented via a vigorous defense of the constitutionality of § 26.

17. Alternatively, the Attorney General should be permitted to intervene under FR Civ P 24(b) because his defense of § 26 will have questions of fact or law in common with the BAMN lawsuit in which he has already been permitted to intervene. His motion is timely and permitting the Attorney General's intervention will in no way unduly delay or prejudice the adjudication of the rights of the original parties since this suit is still in its initial phase.

18. Defendant Granholm has not filed any answer or responsive pleading. Accordingly, intervention should be granted in accordance with FR Civ P 24(b).

19. Under LR 7.1(a), Attorney General Cox has sought concurrence in the motion to intervene from all counsel to the parties in this action. The Governor does not oppose the Attorney General's intervention. Messages have been left with Plaintiffs' counsel and, as of the filing of this motion, no response has been given.

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[2] Const 1963, art 5, §§ 3, 21; MCL 14.28.
[3] See MCL 14.101 See also *Attorney General v Public Service Comm*, 243 Mich App 487, 496-497; 625 NW2d 16 (2000).

WHEREFORE, for the reasons set forth above and in the accompanying brief, Attorney General Michael A. Cox requests that this Court grant his Motion to Intervene pursuant to Fed R Civ P 24(a) and (b).

ATTORNEY GENERAL MICHAEL A. COX'S MEMORANDUM OF LAW IN SUPPORT OF MOTION TO INTERVENE IN THE COMPLAINT FILED BY PLAINTIFFS, AND IN THE CROSS CLAIM FILED BY THE DEFENDANT UNIVERSITIES

CONCISE STATEMENT OF ISSUE PRESENTED

Federal Rule of Civil Procedure 24 accords persons the opportunity to intervene in a matter either as of right or by permission. Here, the Attorney General has a substantial legal interest in the matters presented to this Court in the Complaint, which challenge the constitutionality of Const 1963, art 1, § 26 and which interest will not be adequately represented through Governor Granholm's participation in the suit, thus warranting his intervention as of right. Alternatively, the Attorney General should be permitted to intervene because his defense of § 26 will have questions of fact and law in common with this action. Should this Court therefore exercise its discretion and allow the Attorney General to intervene either as of right or by permission in the underlying complaint?

CONTROLLING OR MOST APPROPRIATE AUTHORITY

Associated Builders & Contrs., Saginaw Valley Area Chapter v Perry,
115 F3d 386 (CA 6, 1997)

Attorney General v Public Service Comm,
243 Mich App 487, 496-497; 625 NW2d 16 (2000)

Jordan v Michigan Conference of Teamsters Welfare Fund,
207 F3d 854, 863 (CA 6, 2000)

Linton v Commissioner of Health & Evn't,
973 F2d 1311, 1319 (CA 6, 1992)

Michigan State v Miller,
103 F3d 1240, 1248 (CA 6, 1997)

Michigan State AFL-CIO v Miller,
103 F3d 1240, 1245 (CA 6, 1997)

Providence Baptist Church v Hillandale Comm, Ltd.,
425 F3d 309, 313 (CA 6, 2005)

Stupak-Thrall v Glickman,
226 F3d 467, 471 (CA 6, 2000)

United States v Michigan,
424 F3d 438, 443-444 (CA 6, 2005)

STATEMENT OF THE FACTS

On December 19, 2006, Plaintiffs, which include applicants to the University of Michigan (U of M), students attending U of M, and current U of M faculty, filed a Complaint for injunctive and declaratory relief raising a facial challenge to newly adopted art 1, § 26 of the Michigan Constitution which became effective on December 23, 2006. The only Defendant is Governor Jennifer Granholm, in her official capacity. The Complaint asserts an equal protection challenge under the Federal Constitution and seeks a declaration that art 1, § 26 does not bar existing U of M admission polices and practices. (Cmpl. ¶ 7).

In the Complaint, Plaintiffs reference a now dismissed cross claim filed in another case challenging art 1, § 26 that is currently pending before this Court. *Coalition to Defend Affirmative Action, et al v Granholm, et al.* (Case No. 2:06-cv-15024, ED Mich) (BAMN lawsuit). In the BAMN lawsuit, on December 11, 2006, the Regents of the University of Michigan, the Michigan State University Board of Trustees, and the Wayne State University Board of Governors (Universities) filed a cross claim asserting a violation of the Universities' alleged First Amendment right of academic freedom to admit a class that best meets their academic goals during the current admissions cycle. The Universities requested a judgment declaring that under federal law they may continue to use their existing admissions and financial aid policies through the end of the current cycle, and otherwise declaring their rights and responsibilities under the art 1 § 26 in light of federal law.

On December 11, 2006, Governor Granholm formally requested that the Attorney General provide her with legal representation in the BAMN lawsuit as provided for by the state constitution and statutes. Recognizing a potential legal conflict because of the differing political positions taken by the Governor and the Attorney General on Proposal 2, now Const 1963, art 1,

§ 26, Governor Granholm requested the creation of a conflict wall to assure the independence of her assigned legal team. In acknowledgement of a legal conflict, and pursuant to the Governor's request, the Attorney General assigned an independent team of Assistant Attorneys General and established a conflict wall in the BAMN lawsuit. On December 14, 2006, the Attorney General filed a motion to intervene in the BAMN lawsuit and sought an expedited hearing on the motion. This Court granted the Attorney General's motion.

Recognizing the unique situation confronting the Universities in their admissions processes that began as early as July 2006, and in fairness to the student applicants whose choices and applications were made well in advance of the adoption of art 1 § 26, the Attorney General agreed that the equities weighed in favor of a narrowly drawn six month temporary injunction. This is what, in the Attorney General's opinion, distinguished the injunctive request on the Universities cross claim from all other issues, such as contracting and hiring. This decision was also strategic in that any stipulated injunctive relief was dependent on dismissal of the Universities' cross claim. On December 18, 2006, the Universities, the Governor, and the Attorney General agreed to the entry of a temporary injunction that would enjoin the application of § 26 to the Universities regarding the current admissions and financial aid cycles, and would expire no later than 12:01 a.m., July 1, 2007. The Universities also agreed to dismiss their cross claim filed against Governor Granholm in its entirety, with prejudice as to the injunctive relief.

On December 19, 2006, the same day that the complaint in this case was filed, this Court entered an order granting the injunction and dismissing the cross claim as stipulated to by the parties in the BAMN lawsuit.

ARGUMENT

Federal Rule of Civil Procedure 24 accords persons the opportunity to intervene in a matter either as of right or by permission. Here, the Attorney General has a substantial legal interest in the matters presented to this Court in the Complaint, which challenge the constitutionality of Const 1963, art 1, § 26 and which interest will not be adequately represented through Governor Granholm's participation in the suit thus warranting his intervention as of right. Alternatively, the Attorney General should be permitted to intervene because his defense of § 26 will have questions of fact or law in common with the lawsuit. This Court should therefore exercise its discretion and allow the Attorney General to intervene either as of right or by permission in the underlying complaint.

A. Standard of Review

The decision whether to grant a motion to intervene lies within the discretion of the District Court.[4]

B. The Attorney General should be allowed to intervene as of right under FR Civ 24(a).

Since Plaintiffs in this case intend to raise the same or similar challenges to art 1 § 26 as in the BAMN lawsuit and dismissed cross claim, the Attorney General seeks leave to intervene in this matter in order to ensure that the Court is presented with the full range of arguments on the questions presented, and so that a vigorous defense of the constitutionality of § 26 may be had.

Federal Rule of Civil Procedure 24(a), states:

> (a) Intervention of Right. Upon timely application anyone shall be permitted to intervene in an action: . . . (2) when the applicant claims an interest relating to the . . . transaction which is the subject of the action and the applicant is so situated that the disposition of the action may as a practical matter impair or impede the applicant's ability to protect that interest, unless the applicant's interest is adequately represented by existing parties.

Four criteria must be met for intervention as a matter of right: (1) the application is timely; (2) the party must have a substantial legal interest in the case; (3) the party must

[4] *Providence Baptist Church v Hillandale Comm, Ltd.*, 425 F3d 309, 313 (CA 6, 2005).

demonstrate that its ability to protect that interest will be impaired in the absence of intervention; and (4) there must be inadequate representation of that interest by the current party.[5] If any of these criteria are not satisfied, a motion to intervene must be denied.[6] The Sixth Circuit has adopted a "rather expansive notion of the interest sufficient to invoke intervention."[7]

A proposed intervenor's burden in showing inadequate representation of its interests is minimal.[8] A showing of possible inadequate representation is sufficient to meet such burden.[9] Despite such a minimal burden, "applicants for intervention must overcome the presumption of adequate representation that arises when they share the same ultimate objective as a party to the suit."[10] The Sixth Circuit has adopted a three-part test to determine if the existing parties adequately represent the interests of a proposed intervenor.[11] The Sixth Circuit has held that a movant fails to meet his burden of demonstrating inadequate representation when (1) no collusion is shown between the existing party and the opposition; (2) the existing party does not have any interests adverse to the intervenor; and (3) the existing party has not failed in the fulfillment of its duty.[12]

In reviewing these factors, it is apparent that the Attorney General's motion to intervene is timely filed as the present lawsuit is in its initial phase. Governor Granholm has not filed any responsive pleading. Moreover, the Attorney General has a substantial legal interest in this matter that will not be adequately represented by the existing parties. The Attorney General, as the State's chief law enforcement officer, has not only a duty to ensure that the laws of the State

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[5] See *Michigan State AFL-CIO v Miller*, 103 F3d 1240, 1245 (CA 6, 1997).
[6] *Stupak-Thrall v Glickman*, 226 F3d 467, 471 (CA 6, 2000).
[7] *Michigan State AFL-CIO*, 103 F3d at 1245.
[8] *Linton v Commissioner of Health & Evn't*, 973 F2d 1311, 1319 (CA 6, 1992).
[9] *Linton*, 973 F2d at 1319.
[10] *United States v. Michigan*, 424 F3d 438, 443-444 (CA 6, 2005).
[11] *Jordan v Michigan Conference of Teamsters Welfare Fund*, 207 F3d 854, 863 (CA 6, 2000).

are followed, but also a duty to defend those laws as enacted by the Legislature, or, as in this case, by the People of Michigan themselves, when those laws are challenged.[13] Concomitant with those duties is the Attorney General's right under Michigan law to intervene in any matter to protect state interests.[14] The Attorney General thus has a substantial legal interest in this matter relating to his duty to defend the constitutionality of § 26 on behalf of the State of Michigan, which interest will not be adequately represented through Governor Granholm's participation in this suit alone.

In *Associated Builders & Contrs, Saginaw Valley Area Chapter v Perry*, the United States Court of Appeals for the Sixth Circuit recognized the Attorney General's broad authority and duty to represent the interests of the State[15]:

> In *Michigan ex rel. Kelley v CR Equipment Sales, Inc*, 898 F Supp 509, 513-14 (WD Mich 1995), District Judge Benjamin Gibson, discussing the same Attorney General involved in the instant case, said:
>
> "Michigan's Attorney General has broad authority to prosecute actions when to do so is in the interest of the state. First, Michigan statutory law provides as follows:
>
> The attorney general shall prosecute and defend all actions in the supreme court, in which the state shall be interested, or a party ... and may, when in his own judgment the interests of the state require it, intervene in and appear for the people of this state in any other court or tribunal, in any cause or matter, civil or criminal, in which the people of this state may be a party or interested. Mich. Comp. Laws Ann. § 14.28 (West 1994). In addition, 'the attorney general has a wide range of powers at common law.' *Mundy v McDonald*, 216 Mich 444, 450; 185 NW 877 (1921). Thus, the Attorney General 'has statutory and common law authority to act on behalf of the people of the State of Michigan in any cause or matter, such authority being liberally construed.' *Michigan State Chiropractic Ass'n v Kelley*, 79 Mich App 789; 262 NW2d 676, 677 (1977) (citations omitted); see also *Mundy*, 216 Mich at 450, 185 NW 877 (Attorney General has broad

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[12] *Jordan*, 207 F3d at 863.
[13] Const 1963, art 5, §§ 3, 21; MCL 14.28.
[14] See MCL 14.101 See also *Attorney General v Public Service Comm*, 243 Mich App 487, 496-497; 625 NW2d 16 (2000).
[15] *Associated Builders & Contrs., Saginaw Valley Area Chapter v Perry*, 115 F3d 386, 390 (CA 6, 1997).

> discretion 'in determining what matters may, or may not, be of interest to the people generally.').
>
> The Court should only prohibit the Attorney General from intervening or bringing an action when to do so 'is clearly inimical to the public interest.' *In re Intervention of Attorney Gen.*, 326 Mich 213; 40 NW2d 124, 126 (1949) (citation omitted); see also *Michigan State Chiropractic Ass'n*, 262 NW2d at 677. Although a procedural distinction exists between intervention and initiating an action, 'there is merger of purpose, by reason of public policy, when the interests of the State call for action by its chief law officer and there is no express legislative restriction to the contrary.' *In re Lewis' Estate*, 287 Mich. 179, 184, 283 N.W. 21 (1938)." See also *Humphrey v Kleinhardt*, 157 FRD 404, 405 (WD Mich 1994).

In that case, the Sixth Circuit determined that then Attorney General Frank Kelley should have been allowed to intervene as of right and appeal a district court decision that held a State statute preempted by federal law where the defendant Director of the Department of Labor and Governor did not appeal, but rather "permitted the thirty-year-old [statute] to go to its demise without fully exercising their right to object."[16] The Court concluded that the State's interests were not adequately represented by the decision not to appeal because substantial questions of law existed as to whether the state statute was in fact preempted by federal law, and that these circumstances warranted the Attorney General's intervention and appeal in the matter[17]:

> The existence of a substantial unsettled question of law is a proper circumstance for allowing intervention and appeal. Where such uncertainty exists, one whose interests have been affected adversely by a district court's decision should be entitled to "receive the protection of appellate review." A failure to seek such protection may constitute inadequate representation warranting intervention. "Although diligent prosecution may not require an appeal in every case . . . appeal . . . should be liberally granted where the judgment of the trial court raises substantial and important questions of law in relation to its correctness."

* * *

[16] *Associated Builders*, 115 F3d at 390.
[17] *Associated Builders*, 115 F3d at 390-392.

> [The Attorney General's] burden of demonstrating inadequacy of representation was minimal, not heavy. Unlike the questionable status of the Electrical Contractors' Association in *Perry I*, [the Attorney General], representing the State of Michigan, has standing to argue the question of ERISA preemption of a state statute.

The circumstances here are analogous to those presented in *Associated Builders* and support the Attorney General's intervention. While this case does not yet involve an appeal and Governor Granholm remains an active party to the suit, it is clear that the State's interests as a whole will not be adequately represented through the Governor's participation given the conflict in legal positions. Although there is no apparent collusion between the Governor and the Plaintiffs, it is expected that the Governor's legal position will more closely align with the positions asserted by the Plaintiffs in this case. Under these circumstances, the Attorney General has met his minimal burden of showing possible – if not probable – inadequate representation in the defense of the constitutionality of § 26 without his intervention. Indeed, Governor Granholm has acknowledged the conflict between the respective positions, and does not oppose the Attorney General's intervention. For these reasons, this Court should exercise its discretion and allow the Attorney General to intervene as of right.

C. Alternatively, the Attorney General should be permitted to intervene under FR Civ 24(b).

Federal Rule of Civil Procedure 24(b), states:

> (b) Permissive Intervention. Upon timely application anyone may be permitted to intervene in an action: . . . (2) when an applicant's claim or defense and the main action have a question of law or fact in common. When a party to an action relies for ground of claim or defense upon any statute or executive order administered by a federal or state governmental officer or agency or upon any regulation, order, requirement, or agreement issued or made pursuant to the statute or executive order, the officer or agency upon timely application may be permitted to intervene in the action. In exercising its discretion the court shall consider whether the intervention will unduly delay or prejudice the adjudication of the rights of the original parties. [Emphasis added.]

Should this Court determine that the Attorney General is not entitled to intervene as of right, he asks that this Court permit him to intervene under FR Civ P 24(b). Again, the Attorney General's motion is timely since this lawsuit is in its infancy. In addition, the Attorney General's defense of § 26 – that it withstands constitutional– will have questions of fact or law in common with this lawsuit.[18] Additionally, this court has already granted permissive intervention in the BAMN lawsuit. Finally, permitting the Attorney General's intervention will in no way unduly delay or prejudice the adjudication of the rights of the original parties since this suit is still in its initial phase and no substantive proceedings have taken place. Accordingly, the Attorney General should be permitted to intervene in accordance with FR Civ P 24(b).

[18] See, e.g. *Michigan State v Miller*, 103 F3d 1240, 1248 (CA 6, 1997), where the Sixth Circuit concluded that the Michigan Chamber of Commerce should have been permitted to intervene in a lawsuit challenging the constitutionality of state campaign finance laws because "[t]he Chamber's claim that the 1994 amendments are valid presents a question of law common to the main action."

CONCLUSION AND RELIEF SOUGHT

For the reasons set forth above and in the accompanying motion, Attorney General Michael A. Cox respectfully requests that this Court exercise its discretion and grant his motion to intervene in the Complaint and Cross Claim filed in this matter pursuant to either FR Civ P 24(a) or (b).

Respectfully submitted,

Michael A. Cox
Attorney General

s/Margaret A. Nelson
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Dated: December 29, 2006

CERTIFICATE OF SERVICE

I hereby certify that on December 29, 2006, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing of the following: **ATTORNEY GENERAL MICHAEL A. COX'S MOTION TO INTERVENE AS A DEFENDANT IN THE COMPLAINT, WITH BRIEF IN SUPPORT** and I hereby certify that I have mailed by United States Postal Service the documents to the following non-ECF participants:

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