IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

JOE SANFELIPPO CABS, INC., G.C.C., INC., ROY WMS, INC., FRENCHY'S CAB COMPANY, INC., 2 SWEETS, LLC,	)	
Plaintiffs,	)	
v.	)	No. 14-CV-1036-LA
CITY OF MILWAUKEE,	)	
Defendant,	)	

PROSPECTIVE INTERVENOR-DEFENDANTS' MEMORANDUM IN SUPPORT OF THEIR MOTION TO INTERVENE AS DEFENDANTS

Prospective Intervenor-Defendants Jatinder Cheema and Saad Malik are taxi drivers who plan to obtain their own City of Milwaukee ("City" or "Milwaukee") taxicab permits under the City's recent taxicab reforms. Cheema and Malik ("Prospective Intervenors"), by and through their undersigned counsel, pursuant to Federal Rule of Civil Procedure 24, state the following in support of their Motion to Intervene as Defendants:

INTRODUCTION

Prospective Intervenor Jatinder Cheema and two other cab drivers fought a case in the Wisconsin courts for over two years to secure their and other independent cab drivers' right to earn a living. And they won. In April 2013, a Wisconsin state court declared unconstitutional the prior Milwaukee taxi regulations that had set a cap on the number of taxis that could be operated in the city, regulations which had precluded Prospective Intervenors from owning their own cabs. The court issued a declaratory judgment and an injunction preventing the City of Milwaukee from enforcing the cap. The court held that the prior regulations served only to

shield existing permit holders from competition and gave them a tremendous windfall. In addition, the court held that the regulations deprived Prospective Intervenors and others of their rights protected by the Wisconsin Constitution to equal protection and to earn a living. In order to comply with that court order the City has enacted legislation reforming its taxicab permitting scheme and opening up its formerly unconstitutional, protectionist system to entrepreneurs such as the Prospective Intervenors.

The Plaintiffs in this case, however, object to the new legislation, and their claims have put Prospective Intervenors' opportunity to achieve their piece of the American dream—and the judgment Prospective Intervenor Cheema won—at risk. If Plaintiffs succeed, the City will be faced with two contradictory orders: one ordering the City to allow Prospective Intervenors into the market as taxicab owners and one ordering it not to. Therefore, the Prospective Intervenors have a direct and important stake in the outcome of this lawsuit and seek leave to intervene as defendants either as a matter of right pursuant to Federal Rule of Civil Procedure 24(a) or, in the alternative, permissively pursuant to Federal Rule of Civil Procedure 24(b). Because the Prospective Intervenors have filed a timely motion and will demonstrate that their interests would not be adequately protected by Defendant, the City, this Court should grant the Prospective Intervenors leave to intervene as defendants under Rule 24(a). In the alternative, this Court should permit the Prospective Intervenors to intervene under Rule 24(b). The City does not oppose this Motion.

STATEMENT OF FACTS

Prospective Intervenors Jatinder Cheema and Saad Malik are Milwaukee taxicab drivers. Cheema has driven a Milwaukee cab since 2002. Cheema Decl. ¶ 4 (attached as Ex. 1). Malik has driven one at various times since the 1990s. Malik Decl. ¶¶ 3, 5 (attached as Ex. 2). Cheema

has always driven a cab for someone else, paying large weekly rent payments to the cab's owner. Malik also drove cabs for others, paying weekly rent, until two months ago when he began driving a cab under a taxi permit that his mother won in the City's recent taxi permit lottery. Cheema Decl. ¶ 6; Malik Decl. ¶¶ 8, 18. Now, because of Cheema's victory in court, each can own their own licensed Milwaukee cab. The Complaint in this action, however, asks this Court to order the City to not allow any new cab permits to be issued, or to pay millions of dollars in compensation. Compl. ¶¶ 20, 60, 63, 65.

This action originated on August 25, 2014, when a group of taxicab owners (collectively, "Plaintiffs") sued the City demanding (1) that the City not issue any new taxicab permits, as its Common Council has just allowed it to do through its new ordinance, File 131800, or, in the alternative, (2) compensate Plaintiffs for the monetary value their permits used to be worth on the artificially limited market for Milwaukee taxicab permits. *Id.* Plaintiffs allege that the City's removal of the cap on taxicab permits constitutes (1) a violation of the Fourteenth Amendment's Equal Protection Clause, *id*. ¶ 1; (2) an unconstitutionally vague ordinance under the Fourteenth Amendment's Due Process Clause, *id*. ¶ 2; and (3) an unconstitutional deprivation of property under the Due Process Clause, *id*. ¶ 3. The City has yet to answer the Complaint. Plaintiffs have filed a motion for a preliminary injunction that will be heard on Wednesday, September 3, 2014.

Jatinder Cheema came to this country in 1981, simply following the American Dream. Cheema Decl. ¶ 3. He lived in New York for some years, where at one point he drove a limousine, and moved to Milwaukee in 2002. *Id.* Since that time he has driven a cab for someone else, driving a night shift. *Id.*

Saad Malik came to this country in 1991 also simply following the American Dream. Malik Decl. ¶ 3. He worked at, and then managed, a gas station, and then began driving a cab

that someone else owned. Malik Decl. ¶¶ 3-5. He has driven for a couple different Milwaukee area cab owners. Malik Decl. ¶¶ 5-6.

Cheema and two other plaintiffs sued the City in September 2011. Cheema Decl. ¶ 11. They claimed that the City's cap on the number of taxicab permits violated the Wisconsin Constitution's guarantees of equal protection and the right to earn a living. Ex. 3 at 7.[1] On April 16, 2013, the Circuit Court of Milwaukee agreed. *Id.* at 62. Circuit Court Judge Jane Carroll ruled that the cap violated Cheema's and his co-plaintiffs' rights under the Wisconsin Constitution. *Id.* Later, on May 30, 2013, the court enjoined the City from enforcing its cap on taxicab permits and entered a final, appealable order on June 18, 2013. Ex. 4 at 17; Ex. 5.

The City appealed and obtained a stay of the injunction pending the appeal, though it withdrew the appeal before a decision from the appellate court. *Ibrahim v. City of Milwaukee*, App. No. 2013AP001710 (Wis. Ct. App. Dist. 1).[2] Meanwhile, in November 2013, the City had enacted a new ordinance that increased the number of permits by 100 via a lottery, and allowed for further study to see if a cap at all was still required. Milwaukee Common Council ("MCC") File No. 130903 (Adopted Nov. 26, 2013).[3] It then held the lottery where there were over 1,700 applications submitted for the 100 available taxicab permits. Cheema Decl. ¶ 17. The Prospective Intervenors applied for cabs in the lottery, but neither received a permit, although Malik's mother did. Cheema Decl. ¶ 17; Malik Decl. ¶ 17.

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[1] The Circuit Court's two rulings and its final order are attached as Exhibits 3, 4, and 5.
[2] The docket for the appeal can be found at http://wscca.wicourts.gov/caseDetails.do?caseNo=2013AP001710&cacheId=1A046D1414B36E6346527816AA2F8758&recordCount=1&offset=0. A trade association to which the Plaintiffs in this case belong filed an amicus brief opposing the independent cab drivers in the *Ibrahim* appeal and pressing many of the same arguments that Plaintiffs are pursuing in the present case. Joe Sanfelippo Cabs, Inc., also filed an amicus brief in the Circuit Court during the briefing for summary judgment.
[3] *Available at* https://milwaukee.legistar.com/Legislation.aspx (search 130903 in 2013).

That new cap was short-lived, however, as it was later repealed on July 22, 2014, through the new ordinance lifting the cap, the subject of the existing action. MCC File No. 131800 (adopted July 22, 2014) (attached as Ex. 6). That latest ordinance, which brings the City fully into compliance with the state court injunction, allows all incumbent holders of taxi permits to continue doing business, but now sets no limit on the number of cabs that may operate in the city. The new ordinance also permits and regulates other car services, such as Uber and Lyft, that may compete with taxis. Both Prospective Intervenors plan to apply for taxicab licenses under the new ordinance and finally start their own taxi businesses without having to purchase an existing permit from someone else. Cheema Decl. ¶¶ 19-21; Malik Decl. ¶ 18.

The Prospective Intervenors had the taxicab cap declared unconstitutional and the City enjoined from enforcing the cap, and even participated in the lottery under the initial ordinance that failed to fully implement Judge Carroll's ruling. But until now, Cheema and many of his fellow drivers have been unable to obtain a cab. The ordinance enacted in July 2014 to comply with the state court's order finally allows them to achieve their dream and get a taxi permit—a dream that will be stopped dead in its tracks if the Plaintiffs prevail in the present action which seeks to nullify their state court judgment.

ARGUMENT

Cheema and Malik, in order to protect their interests in obtaining their long-sought and hard-won taxicab permits and Cheema's state court judgment, seek leave to intervene as defendants in this action. An order by this Court forbidding the City from issuing new taxicab permits, or awarding Plaintiffs the pre-reform market value of their permits, will significantly harm the Prospective Intervenors' interests. Therefore, this Court should grant the Prospective

Intervenors leave to intervene as a matter of right pursuant to Rule 24(a) or, in the alternative, permissively, pursuant to Rule 24(b).

I. THIS COURT SHOULD GRANT THE PROSPECTIVE INTERVENORS LEAVE TO INTERVENE IN THIS ACTION AS A MATTER OF RIGHT PURSUANT TO RULE 24(a).

In relevant part, Rule 24 of the Federal Rules of Civil Procedure provides:

> (a) Intervention of Right. On timely motion, the court must permit anyone to intervene who . . . (2) claims an interest relating to the property or transaction that is the subject of the action, and is so situated that disposing of the action may as a practical matter impair or impede the movant's ability to protect its interest, unless existing parties adequately represent that interest.

Rule 24(a) is construed liberally, with all doubts resolved in favor of intervention. *Michigan v. U.S. Army Corps of Eng'rs*, No. 10-4457, 2010 U.S. Dist. LEXIS 85821, at *7 (N.D. Ill. Aug. 20, 2010) (attached as Ex. 7) ("[A] court should not deny a motion to intervene unless it is certain that the proposed intervenor cannot succeed in its case under any set of facts which could be proved under the complaint."); *see also Lake Investors Dev. Grp., Inc. v. Egidi Dev. Grp.*, 715 F.2d 1256, 1258 (7th Cir. 1983). In the Seventh Circuit, intervention as a matter of right requires prospective intervenors to show that: (1) their motion was timely; (2) they have an interest relating to the property or transaction at stake in the action; (3) the "disposition of the action may as a practical matter impair or impede [their] ability to protect that interest"; and (4) existing parties do not adequately represent the intervenors' interest. *Michigan*, 2010 U.S. Dist. LEXIS 85821, at *6; *Newman v. Imperial Supplies, LLC*, No. 13-C-664, 2013 U.S. Dist. LEXIS 164453, at *3-4 (E.D. Wis. Nov. 18, 2013) (attached as Ex. 8); *accord Wade v. Goldschmidt*, 673 F.2d 182, 185 (7th Cir. 1982). This Court should grant this Motion to Intervene because the Prospective Intervenors satisfy the requirements of Rule 24(a) as set forth below.

Further, the Seventh Circuit has recently propounded an alternative, even more permissive, standard for intervention, holding that intervention requires merely Article III standing plus an additional interest. *See, e.g.*, *City of Chicago v. FEMA*, 660 F.3d 980, 984-85 (7th Cir. 2011) ("Limiting principles such as remoteness must be added atop the requirement of Article III standing to place essential limits on the scope of intervention as a matter of right."); *Bond v. Utreras*, 585 F.3d 1061, 1069-70 (7th Cir. 2009). Prospective Intervenors satisfy this standard because the threat of enforcement of a law—or here, the enforcement of relief prayed for in a lawsuit—is a cognizable injury for the purpose of Article III standing. *Cf. Ezell v. City of Chicago*, 651 F.3d 684, 695-96 (7th Cir. 2011) (pre-enforcement challenges to city ordinances satisfy Article III standing). Moreover, the injury with which the Prospective Intervenors are threatened is the opposite of "remote[ ]"—instead, the Prospective Intervenors' injury is exactly the remedy sought by the Complaint.

A. The Prospective Intervenors' Motion Is Timely.

The Prospective Intervenors' motion to intervene is timely. In determining timeliness, courts in the Seventh Circuit consider four factors: (1) the length of time the intervenor knew or should have known of his interest in the case; (2) any prejudice caused to the original parties by the delay; (3) any prejudice the intervenor would suffer if his motion is denied; and (4) any unusual circumstances. *South v. Rowe*, 759 F.2d 610, 612 (7th Cir. 1985). Here, only a complaint has been filed. No discovery has been taken or motions heard, and the City has yet to respond to the Complaint. *See Miami Tribe of Okla. v. Walden*, 206 F.R.D. 238, 241 (S.D. Ill. 2001) (finding the intervenor's motion timely because it was filed shortly after the commencement of the lawsuit and before the defendants had answered the complaint). The Prospective Intervenors submit with this motion their Partial Motion to Dismiss for Failure to

State a Claim as their required proposed pleading pursuant to Rule 24(c) and wish to have the Partial Motion to Dismiss heard quickly. *See* attached Exs. 10 (Partial Motion to Dismiss) and 11 (Memorandum in Support). Because the Prospective Intervenors filed this Motion to Intervene shortly after the commencement of the lawsuit and do not plan to (or want to) delay the proceedings, Plaintiffs could not possibly claim prejudice as to the timing of this Motion. The Prospective Intervenors, on the other hand, stand to lose their hard-fought constitutional rights and their opportunity to start their own businesses if this Court does not allow them to intervene in this lawsuit. The factor of timeliness weighs in favor of intervention.

B. The Prospective Intervenors Possess an Interest in the Litigation which May Be Impaired or Impeded as a Result of This Litigation.

The Prospective Intervenors plainly have an interest in this litigation because they want to exercise the rights Cheema and his former co-plaintiffs vindicated in their judgment won against the City by obtaining their own taxicab permits. Plaintiffs' lawsuit threatens to foreclose those plans and nullify the judgment, either through invalidation of the law that reformed the City's taxicab system or though ruinous money damages. *See* Compl. ¶¶ 20, 60, 63, 65 (requesting injunctive relief forcing the City to not issue new taxicab permits or pay millions of dollars in damages). These consequences would "impair or impede" the Prospective Intervenors' interests in exercising the rights Cheema and his former co-plaintiffs won for all taxi entrepreneurs under the Wisconsin Constitution and, pursuant to those rights, starting their own businesses.

It is impossible for Plaintiffs to achieve the result they seek *without* injuring the Prospective Intervenors—and therefore, a judgment partially dismissing the Complaint with prejudice would confer immediate benefits (both financial benefits and benefits in the form of peace of mind) on the Prospective Intervenors. *See City of Chicago*, 660 F.3d at 985 ("Cases

allow intervention as a matter of right when an original party does not advance a ground that if upheld by the court would confer a tangible benefit on an intervenor who wants to litigate that ground.") (citing *Kleissler v. U.S. Forest Serv.*, 157 F.3d 964, 969-70, 973-74 (3d Cir. 1998) (permitting timber companies to intervene in action to bar logging in a national forest because the timber companies defending the right to log might have been tempted to agree to a settlement that excluded the would-be intervenors from competing with them for future logging contracts)); *accord Freedom From Religion Found., Inc. v. Koskinen*, No. 12-0818, 2014 U.S. Dist. LEXIS 12783, at *5 (W.D. Wis. Feb. 3, 2014) (attached as Ex. 9) (permitting church and its vicar to intervene in lawsuit by nonprofit against Internal Revenue Service alleging that IRS's policy of not enforcing prohibition on electioneering by nonprofits against churches and religious organizations violates federal Establishment Clause and Equal Protection Clause, so that church and vicar could "protect . . . [their] argument" regarding the Establishment Clause). The Prospective Intervenors' interests are directly threatened by Plaintiffs' request for relief in this case. They are more than sufficient to meet the Seventh Circuit's requirement that intervenors as of right have a direct, non-remote interest in the litigation. *See City of Chicago*, 660 F.3d at 984-85. Because they have interests that would be impaired or impeded as a result of this lawsuit, the Prospective Intervenors have standing to intervene and seek to partially dismiss Plaintiffs' claims.

C. The Prospective Intervenors' Interests Will Not Be Adequately Protected by the Parties.

Intervention is also warranted because the Prospective Intervenors have good reason to believe their interests will not be adequately protected by the parties. Intervention under Rule 24(a) is warranted on the grounds of inadequate representation by existing parties "if the applicant shows that representation of his interest 'may be' inadequate." *Trbovich v. United*

Mine Workers, 404 U.S. 528, 538 n.10 (1972). Ordinarily, "the burden of making that showing should be treated as minimal." *Id.* The burden was satisfied in *Trbovich*, for example, by a prospective intervenor who preferred a different litigation strategy than what was being employed by the Secretary of Labor. *Id.* at 538-39. Inadequacy of representation is particularly likely in cases like this one, where individual litigants seek to intervene on the same side as a government entity. *See, e.g., Nat'l Farm Lines v. ICC*, 564 F.2d 381, 384 (10th Cir. 1977) ("We have here also the familiar situation in which the governmental agency is seeking to protect not only the interest of the public but also the private interest of the petitioners [who sought to protect regulations that financially benefitted them] in intervention, a task which is on its face impossible."). This is because their interests usually differ in size and scope: The government's interest is subject to a wide range of competing demands, including budgetary concerns and sometimes-conflicting public-policy concerns, while an individual's interest in a lawsuit is necessarily much narrower. Courts routinely recognize this principle. *See, e.g., Californians for Safe & Competitive Dump Truck Transp. v. Mendonca*, 152 F.3d 1184, 1190 (9th Cir. 1998) ("[B]ecause the employment interests of IBT's members [in law guaranteeing them a prevailing wage] were potentially more narrow and parochial than the interests of the public at large, IBT demonstrated that the representation of its interests by the named defendants-appellees may have been inadequate"); *Sierra Club v. Glickman*, 82 F.3d 106, 110 (5th Cir. 1996) (permitting intervention by Farm Bureau in case where the USDA was a defendant because, *inter alia*, the Bureau's members were beneficiaries of a government aquifer and had distinct economic concerns that the government did not share).

Further, in this case the Prospective Intervenors have another reason to think the City may not adequately represent them: One of them just spent almost three years litigating a case

against the City in order to achieve the very result that the present action imperils. While the City is currently complying with that judgment, it can hardly be expected in this case to fully represent the legal interests of parties who were its adversaries in the parallel state case.

Moreover, prospective intervenors "should be treated as the best judge of whether the existing parties adequately represent his or her interests, and any doubt regarding adequacy should be resolved in favor of the proposed intervenors." *Michigan*, 2010 U.S. Dist. LEXIS 85821, at *19 (quoting *Miami Tribe of Okla.*, 206 F.R.D. at 243). In this case, the Prospective Intervenors believe that their interests will not be adequately represented by the City. Cheema Decl. ¶ 23; Malik Decl. ¶ 26. And in addition to the fact mentioned above—that taxi drivers had to sue the City before to vindicate the rights the City is now trying to protect—this belief is eminently reasonable: The City faces a wide variety of political and budgetary pressures that could very easily lead it to pursue a litigation strategy that is at odds with the Prospective Intervenors' interests or even to settle this litigation outright. *See Builders Ass'n of Greater Chicago v. City of Chicago*, 170 F.R.D. 435, 441 (N.D. Ill. 1996) (noting that a difference in prospective intervenors' and City of Chicago's interests "could manifest itself later in the litigation should the City decide to accept a settlement that would financially harm applicants' members").

A recent case illustrates this situation well. In *Michigan v. U.S. Army Corps of Engineers*, 2010 U.S. Dist. LEXIS 85821, the City of Chicago, a group of trade associations, and a sightseeing company sought to intervene as defendants in a lawsuit by several states against the U.S. Army Corps of Engineers and the Metropolitan Water Reclamation District of Greater Chicago. The states sought an injunction enjoining the defendants to take measures to prevent the migration of Asian carp through the Chicago Area Waterway System ("CAWS") into Lake

Michigan. *Id.* at *3. The intervenors were parties that would be harmed by disruption of the CAWS—the City of Chicago, which had an interest in ensuring that the CAWS could continue to be operated in a manner that protected the public health and safety; the trade associations, whose members could "lose significant business, if not cease operations entirely;" and the sightseeing company, which would be forced to shut down its water taxi business if the locks on the CAWS were closed. *Id.* at *15.

The court allowed all of the parties to intervene. It reasoned that the original defendants' "broad duty" as regulators to minimize the migration of Asian carp into Lake Michigan was different from the group of trade associations' interest in "protect[ing] the economic viability of its members" and the sightseeing company's interest in the "financial viability of its business." *Id.* at *22. Similarly, here, the City's broad interest in its own discretion and general concern for the public safety and public fisc is different from the Prospective Intervenors' basic interest in their own businesses and continued freedom. A potential difference in incentives and approach were enough to justify intervention in *Michigan*, and it is enough here. *See id.* ("Defendants *may well face* a potential conflict of interest were they to try to represent both the general interest of the public and the financial interests of the [intervenors]" (emphasis added)).

II. IN THE ALTERNATIVE, THIS COURT SHOULD PERMIT THE PROSPECTIVE INTERVENORS LEAVE TO INTERVENE IN THIS ACTION PURSUANT TO RULE 24(b).

Applicants alternatively seek permissive intervention pursuant to Rule 24(b). Permissive intervention is appropriate where (1) the motion is timely; (2) the prospective intervenor's claim or defense has a question of law or fact in common with the main action; and (3) intervention will not unduly delay or prejudice the original parties. *Builders Ass'n of Greater Chicago*, 170 F.R.D. at 441. A trial court allows permissive intervention at its discretion. *See City of Chicago*

v. FEMA, 660 F.3d at 987. As explained below, the Prospective Intervenors' proposed intervention easily satisfies Rule 24(b)'s standards because it is timely, will concern the same legal and factual issues as those raised by Plaintiffs, and will not unduly delay or prejudice the rights of the original parties.

First, as explained above in Part I.A, the Prospective Intervenors' motion is timely. The Prospective Intervenors seek intervention at the earliest stage possible in these proceedings, shortly after the complaint has been filed and when little else has yet occurred.

Second, because one of the Prospective Intervenors is one of the very parties who obtained the judgment that forced the City to lift the cap on taxicab permits, the other Prospective Intervenor also stands to directly benefit from that judgment, and Plaintiffs wish to nullify that judgment through this lawsuit, the Prospective Intervenors' defense will share questions of law and fact in common with Plaintiffs' action against the City. The Prospective Intervenors wish to defend against all of Plaintiffs' claims against the City. They also will have the assistance of a public-interest law firm known for its expertise in litigating cases involving transportation regulation across the country, and, indeed, represented Prospective Intervenors in their successful challenge to the City's former taxicab cap where they obtained a declaratory judgment and an injunction. The Prospective Intervenors believe that they can be of great assistance to this Court in framing and understanding the issues at stake in this case.

Third, as discussed above, the Prospective Intervenors' intervention will not unduly delay or prejudice the rights of the original parties. Granting the Prospective Intervenors' motion to intervene will not delay resolution of this lawsuit, which the Prospective Intervenors wish to have dismissed as quickly as possible.

CONCLUSION

Jatinder Cheema won a major victory last year and vindicated Milwaukee taxi drivers' right to earn a living by securing the opportunity to own their own taxis, obtaining a state court judgment against the City. The City has now complied with that judgment. But Cheema and Malik stand to lose their chance to make this victory a reality and own their own cabs, and the judgment's effect will be nullified, if Plaintiffs' lawsuit is successful. The City cannot adequately represent the Prospective Intervenors' personal interests, and that is why they have made this timely motion to intervene as defendants in this lawsuit. For the foregoing reasons, the Prospective Intervenors respectfully request that this Court enter an order (1) granting their Motion to Intervene and (2) granting the Prospective Intervenors any further relief this Court deems just and necessary.

Dated: August 29, 2014

Respectfully submitted,

/s/ Anthony B. Sanders

Anthony B. Sanders (MN Bar No. 0387307)
INSTITUTE FOR JUSTICE
527 Marquette Ave., Suite 1600
Minneapolis, MN 55402
Tel.: (612) 435-3451
Fax: (612) 435-5875
Email: asanders@ij.org

Lawrence G. Salzman (CA Bar No. 224727)
INSTITUTE FOR JUSTICE
901 North Glebe Road, Suite 900
Arlington, VA 22203
Tel: (703) 682-9320
Fax: (703) 682-9321
Email: lsalzman@ij.org

Attorneys for Prospective Intervenor-Defendants

Michael D. Dean (Wis. Bar No. 01019171)
MICHAEL D. DEAN LLC
17035 W Wisconsin Ave - Ste 100
PO Box 2545
Brookfield, WI 53008
262-798-8044
262-798-8045 (fax)
miked@michaelddeanllc.com

Local Counsel for Prospective Intervenor-Defendants