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5 Attorneys for Proposed Intervenor-Real Party
in Interest Valley Meat Co., LLC
6

7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION
9

10 FRONT RANGE EQUINE RESCUE, THE
HUMANE SOCIETY OF THE UNITED
11 STATES, MARIN HUMANE SOCIETY,
HORSES FOR LIFE FOUNDATION,
12 RETURN TO FREEDOM, RAMONA
CORDOVA, KRYSTLE SMITH, CASSIE
13 GROSS, DEBORAH TRAHAN, and
BARBARA SINK,

14 Plaintiffs,

15 v.

16 TOM VILSACK, Secretary U.S.
Department of Agriculture; ELIZABETH A.
17 HAGEN, Under Secretary for Food Safety,
U.S. Department of Agriculture; and
18 ALFRED A. ALMANZA, Administrator,
Food Safety and Inspection Service, U.S.
19 Department of Agriculture,
20

21 Defendants.
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CASE NO. 4:13-CV-03034-YGR

**MOTION TO INTERVENE BY VALLEY
MEAT COMPANY, LLC**

23 Pursuant to Federal Rule of Civil Procedure 24(a) Valley Meat Company, LLC
24 ("Valley") moves this Court for permission to intervene as defendants in the above-
25 captioned matter. Proposed Intervenor should be granted leave to intervene as of right
26 because (1) it has timely filed this Motion to Intervene, (2) it is a Real Party in Interest, (3)
27 Its interests will be impaired if Plaintiff's claim is successful, and (4) Its interests will not
28 adequately be represented by the named defendants. In support of this Motion to

1 Intervene, Proposed Intervenor submit the following pleadings, which are incorporated by
2 this reference:

3 Memorandum in Support of Motion to Intervene;

- 4 • Declarations of Ricardo de Los Santos, Owner/General Manager of Valley Meat
5 Company, LLC, and A. Blair Dunn, Esq. in Support of Motion to Intervene;

6 Complaint in Intervention and Motion to Dismiss.

7 Pursuant to local rule 7.1, Counsel for Valley Meat Company, LLC has contacted counsel
8 for Plaintiffs and Defendants to determine whether they oppose this motion. Counsel for
9 Plaintiffs has indicated that plaintiffs will oppose this motion, and counsel for defendants
10 have indicated that defendants do not oppose this motion. See Declaration of A. Blair
11 Dunn in Support of Motion to Intervene.

12 WHEREFORE, for the foregoing reasons, Proposed Intervenors respectfully
13 request that this Court grant their motion to intervene as intervenor defendants.

14
15 DATED: July 8, 2013

Respectfully submitted,

HANSON BRIDGETT LLP

17 By: /s/ Michael J. Van Zandt
18 MICHAEL J. VAN ZANDT (CA SBN: 96777)
19 Attorneys for Proposed Intervenor-Real Party

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of San Francisco, State of California. My business address is 425 Market Street, 26th Floor, San Francisco, CA 94105.

On July 8, 2013, I served true copies of the following document(s) described as

MOTION TO INTERVENE BY VALLEY MEAT COMPANY, LLC

BY CM/ECF NOTICE OF ELECTRONIC FILING: I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 8, 2013, at San Francisco, California.

/s/ Keith Kiley _____
Keith Kiley