

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

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FRONT RANGE EQUINE RESCUE,)	
<i>et al.,</i>)	
)	
)	
Plaintiffs,)	
v.)	Civ. No. 1:13-cv-00639-MCA-RHS
)	
TOM VILSACK, Secretary,)	
U.S. Department of Agriculture, et al.,)	
)	
)	MOTION TO INTERVENE OF
)	RAINS NATURAL MEATS AND
)	CHEVALINE, LLC
Federal Defendants.)	
)	

Pursuant to Federal Rule of Civil Procedure 24(a) Rains Natural Meats (“RAINS”) and Chevaline, LLC (CHEVALINE) move this Court for permission to intervene as defendants in the above-captioned matter. Proposed Intervenor should be granted leave to intervene as of right because (1) it has timely filed this Motion to Intervene, (2) it is a Real Party in Interest, (3) their interests will be impaired if Plaintiff’s claim is successful, and (4) their interests will not adequately be represented by the named defendants. In support of this Motion to Intervene, Proposed Intervenor submit the following pleadings, which are incorporated by this reference:

- Memorandum in Support of Motion to Intervene;
- Declarations of Sue Wallis, Owner/Manager of Chevaline, LLC, David Rains, Shareholder/Director and Vice-president of Pro-Show Enterprises, Inc. d/b/a Rains Natural Meats and A. Blair Dunn, Esq. in Support of Motion to Intervene;
- Response in Opposition To Plaintiff’s Motion for Temporary Restraining Order and Preliminary Injunction

Pursuant to local rule 7.1, Counsel for Proposed Intervenors has contacted Plaintiffs and Defendants to determine whether they oppose this motion. Counsel for Plaintiffs refused to indicate whether plaintiff will oppose this motion without first seeing the document as should be deemed to oppose, and counsel for Defendants have indicated that defendants take no position this motion. See *Declaration of A. Blair Dunn in Support of Motion to Intervene*.

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

Dated: July 19, 2013

By: - Electronically Signed by – A. Blair Dunn
A. Blair Dunn, (NM Bar #121395)
Attorneys for Proposed Intervenor -Real Party
in Interest Chevaline, LLC
and Rains Natural Meats
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CERTIFICATE OF SERVICE

I certify that I filed the foregoing documents on July 19, 2013 using the ECF System, which will send notification to all parties of record.

- Electronically Signed by – A. Blair Dunn
A. Blair Dunn, Esq.