



have any reason to seek intervention, one of the purposes of Rule 23, among others, being to obviate intervention.

4. If intervention were not allowed here, these women would be placed in the position of having to file their own separate suits. Compared to intervention, that would prejudice all interested parties—increasing the burdens and costs for the women, for the Defendants, and for the court system.

5. The existing plaintiffs do not oppose this motion.

6. A copy of the proposed complaint in intervention, setting out the claims for which intervention is sought, is Exhibit B to this motion. Fed. R. Civ. Proc. 24(c).

For these reasons, the 529 women listed on Exhibit A to this motion request leave to intervene in this case.<sup>1</sup>

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<sup>1</sup> In one case, the moving party is the estate of a deceased former class member.

Dated: July 7, 2021

Respectfully submitted,

/s/ Noelle Brennan  
One of the Attorneys for Plaintiffs

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**CERTIFICATE OF SERVICE**

I hereby certify that on **July 7, 2021**, I electronically filed the foregoing **MOTION TO INTERVENE BY 529 WOMEN** with the Clerk of the Court using the ECF system, which sent electronic notification of the filing on the same day to all counsel of record via the Court's CM/ECF system.

/s/ Noelle Brennan \_\_\_\_\_  
One of the Attorneys for Plaintiffs

# **EXHIBIT**

# **A**

## EXHIBIT A

### Plaintiff-Intervenors

1. Monica Abner
2. Monshai Addison
3. Kudirat Adelaja
4. Cara Alger
5. Carmerdetta Allen
6. Rhonda Allen
7. Betty Anderson
8. Jacquelyn Anderson
9. Kim Anderson
10. Latrice Anderson
11. Tania Andrade
12. Cassandra Andrews
13. Rosa Arellanes
14. Janice Austin
15. Lisa Austin
16. Rosa Avila
17. Jennifer Bailey
18. Linda Banks
19. Vanessa Barajas
20. Darlene Baran
21. Kimberly Barker
22. Janice Barnes
23. Jevon Bates
24. Vernita Battle
25. Marisol Bednarik
26. Carol Begley
27. Rebecca Belk
28. Kimberly Bennett
29. Shantel Bernard
30. Lashan Berry
31. Amanda Bertrand
32. Ardenia Beverley
33. Frederica Bishop
34. Aiesha Bogan
35. Markitha Bolden
36. Sherry Boler
37. Sherrie Bond
38. Lanisha Bonds

39. Regina Bonner
40. Jessica Bosques
41. Kimberly Bowen
42. Sandra Bowens
43. Chantia Boyd
44. Veneise Braxton
45. Victoria Bridgeforth
46. Joy Bridges
47. Catrina Brown
48. Gerrylen Brown
49. Jacqueline Brown
50. Jacqueline Brown
51. Monique Brown
52. Rekeenya Brown
53. Tabitha Brown
54. Trina Brown
55. Ayesha Brown-Burge
56. Patricia Brown-Conley
57. Debbie Brown-Kirkpatrick
58. Erica Bryant
59. Mara Bryant
60. Judith Bush-Butler
61. Danielle Byndom
62. Kawanna Cade
63. Victoria Calderon
64. Avis Calhoun
65. Carly Califello
66. Luz Canada
67. Nicole Campbell
68. Erica Cannon-Smith
69. Kajundii Cannon-Smith
70. Jennifer Carfo
71. Loletia Carney
72. Lauren Cartwright
73. Angela Champ
74. Evaresta Charles
75. Tiffany Chestine
76. Deborah Chojnowski
77. Linda Churchill
78. Romonica Clark
79. Sherita Clay

80. Tiffany Coats
81. Crystal Coleman
82. Shenita Coleman
83. Lisette Collazo
84. Artrener Collier
85. Pamela Collins-Cunningham
86. Lena Colon
87. Cheryl Condon
88. Elizabeth Connors
89. Robyn Contreras
90. Jessica Correa
91. Sharon Cox
92. Renae Craig
93. Michelle Creamer
94. Tanisha Cribbs
95. Waltraud Cruz
96. Lidia Culbertson
97. Lisa Cunningham
98. Babs Cusic
99. Denise Daniel
100. Shirley Davila
101. Lanieka Davis
102. Shadonna Davis
103. Twanna Davis
104. Raquel Dearman
105. Rebecca DeJesus
106. Erin Delegan
107. Denise DeMichel
108. Lytton Despenza
109. Angela Deyoung
110. Monique Dixon
111. Tami Dixon
112. Yolanda Dixon
113. Amparo Donner
114. Yazmin Dorantes
115. Mary Downes
116. Truvander DuBois
117. Shamone Duncan
118. Quintoria Dunmars
119. Latanya Dunn
120. Mavis Dunn

121. Evelyn Durden
122. L'Mekka Edwards
123. Gloria Ellis
124. Yukota Ellis
125. Nyema Ellison
126. Regina Eppes-Davis
127. Mildred Erames
128. Nancy Erasga
129. Catherine Esquivel
130. Wanda Estes
131. Sonia Evans
132. Akiba Evans-Bozeman
133. Mary Evans Campbell
134. Erin Evers
135. Sherry Felton-Robinson
136. Julie Field
137. Latehesha Fitch
138. Jonnie Fleming
139. Yvonne Fleshman
140. Ivonne Flores
141. Grace Flowers
142. Lynette Flowers
143. Emma Floyd
144. Chekqwita Franklin
145. Carolyn Frasure
146. Brittany Frazier-McCoy
147. Dorothea Friend
148. Ebony Friend
149. Victoria Furlow
150. Diane Galan
151. Elise Galtney
152. Sylvia Gamboa
153. Rebecca Garcia
154. Trinidad Garcia
155. Tracie Garmon
156. Sarah Garner
157. Antoinette Garrett-Williams
158. Noemi Gaud
159. Desirea Gell
160. Lonette George
161. Talojia Gilmore

162. Cecilia Glenn
163. Michelle Golden
164. Kimyata Gray
165. Barbara Green
166. Patricia Green
167. Felecia Greenwood
168. Norma Griffin
169. Dionne Griggs
170. Sheleda Groves
171. Mireya Guerrero
172. Intisar Haddad
173. Toya Hairston
174. Jaclynn Hanley
175. Danielle Harms
176. Andrea Harris
177. Kimberly Harris
178. Tiffany Harris
179. Stephanie Hartley
180. Sandra Hatten
181. Chenay Hatwood
182. Angela Hawkins
183. Patricia Hayes
184. Adriene Hayes-Hoy
185. April Haygood
186. Leslie Hearn
187. Pamela Heiy
188. Gabriela Henderson
189. Tanisha Henderson
190. Julie Hensley
191. Lori Hernandez
192. Angelique Herrera
193. Kalisa Hill
194. Deborah Hillyard
195. Alesia Hines
196. Chere Hodges
197. Karolina Hogueisson
198. LaShawn Holmes-Bossman
199. Linda Holmes-Miller
200. Brenda Hope
201. Phyllis Hope
202. Annette Hopkins

203. Peggie Houpe
204. Janice House-Deering
205. Yvette Houser
206. Erika Hovel
207. Dawn Howell
208. Rosette Hunter
209. Bridget Insley
210. Carolyn Jackson
211. Ruby Jackson
212. Sharon R. Jackson
213. Stephanie Jackson
214. Tiffany Jackson
215. Tracey Jackson
216. Katie Jacobowski
217. Glenda Jacobs
218. Patti Jagielski
219. Yvette James
220. Melissa Jaroch
221. Elizabeth Jefferson
222. Michele Jeffley
223. Anita Johnson
224. Natalie Johnson
225. Teqeira Johnson
226. Teresa Johnson-Green
227. Denise L. Jones
228. Erica J. Jones
229. Erica M. Jones
230. Karen Jones
231. Katella Jones
232. Natasha Jones
233. Theresa M. Jones
234. Trinette Jones
235. Uveeda Jones
236. Candice Kaminski
237. Janice Kelly
238. Megan Kelly
239. Sybil Keys
240. Christina Killis
241. Julia Kimmons
242. Gayle King
243. Mary Kosenka-Pistello

244. Sylwia Kowalczyk
245. Cherri Krzyzowski
246. Yolanda Lambert-Wilson
247. Shonnita Lanier
248. Jasmin Lassere
249. Ann Laszczak
250. Christina Latoria
251. Diane Lavender
252. Piper Lawrence
253. Jackie Lee
254. Dorota Lepionka
255. Ida Lewis
256. Carmalita Lewis-Buchanan
257. Juanita Lilly
258. Sharon Linear
259. Velinda Llorens
260. Javan Lloyd
261. Alicia LoBianco
262. Lisa Locke
263. Juanita Long
264. Lyndria Long
265. Christina Lopez
266. Lisa Lopez
267. Danielle Mack-Hewitt
268. Lakisha Macklin
269. Felicia Madlock
270. Gloria Maeweather
271. Angela Maniak
272. Yitzel Mansour
273. Susana Marquez
274. Blancanieve Marrero
275. Jennifer Marszewski
276. Ruby Martin
277. Diedre Martin-Howard
278. Rosito Marzo
279. Rebecca Masi
280. Erica Mason
281. Jennifer Matthews
282. Erin McCann
283. Queen McCarthy
284. Kimtrina McClelland

285. Catherine McClendon
286. Valerie McClendon-Lofton
287. Janie McConnell
288. Darlene McCord
289. Dildred McCoy
290. Rita McCoy
291. Monica McElvaine
292. Margaret McGonegal
293. Sharon McHugh
294. Leslie McKennie
295. Melinda McKinney
296. Robin McLendon
297. Christina Medina
298. Kristen Melendez
299. Christine Mendenhall
300. Alishia Mercherson
301. Dorice Merriweather
302. Terri Merriweather
303. Debra Meyer
304. Sandra Miller
305. Shekena Miller
306. Alisa Mims
307. Cynthia Mitchell
308. Kalaveeta Mitchell
309. Melissa Mitchell
310. Sonya Mitchell
311. Laura Mlinarcik
312. Irene Modunkwu
313. Rhonda Monroe
314. Jeiza Montes
315. Antionetta Montgomery
316. Kina Montgomery
317. Dalfanita Moore
318. Erica Moore
319. Lorraine Moore
320. Pamela Moore
321. Denise Morales
322. Alice Moreno
323. Beverly Morgan
324. Cynthia Morgan-Jackson
325. Diane Morrison

326. Daarina Muhammad
327. Colleen Mulcahy
328. Zaira Muneton
329. Jessica Munoz
330. Lauren Munoz
331. Annette Myers
332. Jacqueline Myers
333. Kimberly Myers
334. Patricia Navarro
335. Jacquetta Nealon
336. Tracy Nelson
337. Tara Nemeth
338. Vickie Neylon
339. Miranda Nickel
340. Edith Nieweglowski
341. Aisha Nixon
342. Heather Nolan
343. Datche Norman
344. Denise Norwood
345. Melissa Obermayr
346. Portia O'Connor
347. Felicia Ogbuli
348. Edith Okosi
349. Bunmi Omodara
350. Juwana Orr
351. Lisa Oswald
352. Patricia Outlaw-Clay
353. Andrea Parker
354. Bonnie Parker
355. Sandra Parker
356. Sylvia Parks
357. Felisha Parnell
358. Melissa Passini
359. Franchon Pate
360. Vandana Patel
361. Cecilia Patterson
362. Lita Patterson
363. Sharon Patterson
364. Shari Payne
365. Marilyn Pennington
366. Elizabeth Perez

367. Ramonita Perez
368. Demetrius Perkins
369. Barbara Phillips
370. Debra Pitts-Doss
371. Laura Pliego
372. Lynn Pliska
373. Clarice Plott
374. Evelyn Pollock
375. Kelli Polo
376. Lori Ponce
377. Laneshia Pondexter
378. Annette Porter
379. Nachaka Porter
380. Sherice Pratt
381. Reay Price
382. Dawn Pruento
383. Lisa Purtill
384. Evelyn Quintana
385. Lina Rackauskaite
386. Jessica Rahn
387. Alma Ramic
388. Desiree Ray
389. Bobbi-Ann Reed
390. Denise Reed
391. Roxanne Reicher
392. Verna Reyna
393. Aishah Richards
394. Youlonda Richards-Wilkins
395. Nancy Rivera
396. Tiffany J. Robertson
397. Cynthia Robinson
398. Denise Robinson
399. Vanessa Robinson
400. Bessie Louise Roddy
401. Mary Rodriguez
402. Carlella Rogers
403. Crystal Royal
404. Nikki Ruffin
405. Judith Salazar
406. Gerda Salomon
407. Angelica San Andres

408. Maria San Roman
409. Monica Sanchez
410. Belinda Sanders
411. Dorrie Sanders
412. Terry Sanders
413. Amelia Sandoval
414. Asian Sanford
415. Jan Sangster
416. Patsy Savage
417. Elaine Scott
418. Jerry Scott
419. Patrice Scott
420. Kye Shaffer
421. Zaheerah Shareef
422. Bernice Shaw
423. Rudeen Shearer
424. Cassandra Shelton
425. Kelly Shields
426. Jamie Short
427. Martenia Shyne
428. Twitchy Siddiqui
429. Jessica Silva
430. Elvia Silvera
431. Jennifer Simon
432. Maxie Simon
433. Melinda Slaughter
434. Patricia Smart
435. Christina Smith
436. Jacinta Smith
437. Joanne Smith
438. Katie Smith
439. Susie Smith-Awolaja
440. Willeta Smith
441. Avis Smithrud
442. Brenda Spraggins
443. Valerie Spurlock
444. Latisha Statham
445. Yvonne Stott
446. Michelle Strickland
447. Rose Sturdivant
448. Alinda Swanigan

449. Lashundra Tabb
450. Dora Tapia
451. Carmen Tate
452. Alexis Taylor
453. Beverly Taylor
454. Lynette Taylor
455. Sharon Taylor
456. Patrice Tears
457. Lourdes Tejada
458. Maria Tejada
459. Yolanda Therfield
460. Cecelia Thomas
461. Chikira Thomas
462. Danielle Thomas
463. Oneka Thomas
464. Sharon Thomas
465. Veronica Thomas
466. Ricquia Thomas-Carter
467. Evalla Thomas-Harris
468. Gwendolyn Thompson
469. Sylvia Tidwell
470. Jazmin Tijerina
471. Kimberly Timberlake
472. Shirley Toney
473. Ayesah Toney
474. Maria Torres
475. Terri Townsend
476. Evette Trejo
477. Tiana Tucker
478. Karen Turner
479. Linette Tyler
480. Barbara Unseld
481. Elma Vasquez
482. America Velez
483. Velinda Vercher
484. Jamila Villareal
485. Katrina Walker
486. Chontel Walker-Maxey
487. Linda Walker-Morris
488. Patrina Walton
489. Belinda Ware

490. Vicki Wash
491. Bettana Washington
492. Diane Washington
493. Quiana Washington
494. Tiffany Washington
495. Tracy Washington
496. Hester Washington-Farr
497. Leola Watkins
498. Michelle Watkins
499. Erin J. Watson
500. Lynnitia Watson-Peavy
501. Janet Watts
502. Alicia Webster
503. Lourdes Welbon
504. Pamela West
505. Peggy Westbrook
506. Angelique Westmoreland
507. Angelita White
508. Tonnisa White
509. Kim Wiggins
510. Marthenia Wiley
511. Crystal Williams
512. Felicia Williams
513. Karen Williams
514. Nikola Williams
515. Ronica Williams
516. Pamela Williamson
517. Lorna Willoughby
518. Cynthia Wilson
519. Sharon Wilson
520. Vicki Wilson
521. Yawfis Wilson
522. Sakeisha Winston
523. Diane Winter
524. Angela Wright
525. Linda Wright
526. Sharon Wright
527. Crystal Yance
528. Lisa Yates
529. Ladonna Young