

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
(Huntington Division)

OHIO VALLEY ENVIRONMENTAL)
COALITION, *et al.*,)
)
Plaintiffs,)
)
v.) Civil Action No. 3:02-CV-59
)
CHRISTIE WHITMAN, Administrator,)
United States Environmental Protection Agency,)
)
Defendant.)

**JOINT MOTION TO INTERVENE OF
WEST VIRGINIA MUNICIPAL WATER QUALITY ASSOCIATION,
WEST VIRGINIA MUNICIPAL LEAGUE, AND
ASSOCIATION OF METROPOLITAN SEWERAGE AGENCIES**

The West Virginia Municipal Water Quality Association, the West Virginia Municipal League, and the Association of Metropolitan Sewerage Agencies (collectively, the “Municipal Associations”), by counsel, hereby move to intervene in this action as party defendants as a matter of right pursuant to Fed. R. Civ. P. 24(a)(2) and, alternatively, for permissive intervention pursuant to Fed. R. Civ. P. 24(b)(2), for the reasons explained in the accompanying memorandum. In accordance with Fed. R. Civ. P. 24(c), the proposed Answer of the Municipal Associations also accompanies this motion.

Respectfully submitted,

WEST VIRGINIA MUNICIPAL WATER
QUALITY ASSOCIATION

WEST VIRGINIA MUNICIPAL LEAGUE

ASSOCIATION OF METROPOLITAN
SEWERAGE AGENCIES

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