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9 *Attorney for Movant-Intervenor United*  
10 *Policyholders*

11 IN THE UNITED STATES DISTRICT COURT

12 FOR THE DISTRICT OF ARIZONA

13 Karen Cosgrove, a single person,

No. CV-14-02229-PHX-HRH

14 Plaintiff,

15 v.

**MOTION TO INTERVENE**

16 National Fire & Marine Insurance  
17 Company, a foreign insurer,

ORAL ARGUMENT REQUESTED

18 Defendant.

19 United Policyholders hereby moves this Court, pursuant to Federal Rule of Civil  
20 Procedure 24, to intervene in this action for the limited purposes of unsealing and  
21 reinstating the Court's partial summary judgment opinion (Docket No. 171) and related  
22 minute entry (Docket No. 170).

23  
24 In support of this motion, Movant-Intervenor United Policyholders submits the  
25 accompanying Memorandum in Support, Declaration of Daniel Wade with an exhibit,  
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28

1 and a proposed order. In addition, Movant-Intervenor United Policyholders is filing a  
2 Motion to Unseal and Reinstate Court Records to accompany this Motion to Intervene.  
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4 For the reasons stated in these papers, United Policyholders respectfully requests  
5 that it be permitted to intervene in this action.  
6

7 November 3, 2017

Respectfully submitted,

8 /s/ Dustin Cho

9 Dustin Cho (*pro hac vice*)

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 3, 2017, I electronically transmitted the foregoing Motion to Intervene, Memorandum in Support, Declaration of Daniel Wade with one exhibit, and accompanying proposed order to the Clerk’s Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

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By: /s/ Dustin Cho  
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