

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

**THE HONORABLE NEWT GINGRICH, THE  
HONORABLE JON HUNTSMAN, JR.,  
and THE HONORABLE RICK SANTORUM**

**Proposed Plaintiffs-Intervenors,**

**Civil No. 3:11-CV-856**

vs.

**CHARLES JUDD, KIMBERLY  
BOWERS, and DON PALMER, members  
of the Virginia State Board of Elections, in  
their official capacities, and PAT MULLINS,  
in his official capacity as Chairman of the  
Republican Party of Virginia,**

**Defendants.**

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**CONSENT LETTER OF PARTIES TO LEGAL REPRESENTATION**

To the Honorable Court:

In an Order dated January 4, 2012, this Court requested Counsel for Plaintiffs in Intervention, J. Christian Adams to file either a signed consent form from the General Counsel for the Plaintiffs in Intervention, or in the alternative, an explanation as to why no conflict of interest exists in this representation.

The signed consent executed by the general counsels for Plaintiffs in Intervention is included as an attachment to this pleading.

Further, by way of explanation, the parties here have uniform interests. In particular the parties have uniform interests in the remedy sought in this case - being added to the ballot in the 2012 Virginia Republican Primary. While the parties may indeed be seeking the same office, all

are in uniform agreement on the central issue in this case, that they should be added to the ballot. Remaining mindful of any conflict which may arise, and the associated professional obligations, the narrow issues now before this court do not create adverse interests between intervening plaintiffs precluding representation. Moreover, the issue before this court, and the uniform remedy sought, does not now materially limit representation of any intervening plaintiff as compared to the interests of another intervening plaintiff. Counsel for the intervening parties have considered carefully the implications of this representation and have concluded, as have I, that the narrow issues before this court do not, in fact, create a conflict between intervening plaintiffs on the matters which are the subject of this intervention.

Respectfully submitted,

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/S/  
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## CERTIFICATE OF SERVICE

I hereby certify that on the 4<sup>th</sup> day of January, 2012, I have electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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Respectfully submitted this 4<sup>th</sup> day of January, 2012.

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