

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED

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**UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT**

<b>GREEN MOUNTAIN CHRYSLER</b>	)
<b>PLYMOUTH DODGE JEEP, <i>et al.</i></b>	)
	)
<b>PLAINTIFFS,</b>	)
	)
<b>v.</b>	)
	)
<b>GEORGE CROMBIE, <i>et al.</i></b>	)
	)
<b>DEFENDANTS,</b>	)
	)
<b>GREENPEACE, INC.</b>	)
	)
<b>INTERVENOR.</b>	)
_____	)

Docket Nos. 02:05-CV-302  
02:05-CV-304  
(Consolidated)

**MOTION TO INTERVENE OF DR. PATRICK J. MICHAELS**

Dr. Patrick J. Michaels respectfully moves this Court for intervention in this action. Dr. Michaels seeks intervention for the sole purpose of opposing the June 8, 2007 motion of Greenpeace, Inc. to unseal certain of his confidential business information. This information was produced in discovery in this action and was designated as "highly confidential" under the First Amended Stipulation and Protective Order Regarding Handling of Confidential Information, entered by this Court on July 11, 2006. Dr. Michaels seeks intervention as of right under Fed. R. Civ. P. 24(a)(2) and permissive intervention under Fed. R. Civ. P. 24(b)(2). Dr. Michaels' motion is supported by the attached Memorandum in Support and by his attached Affidavit.

Dated: July 6, 2007

Respectfully submitted,



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UNITED STATES DISTRICT COURT  
FOR THE  
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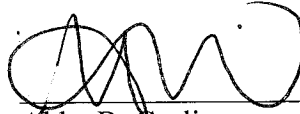
<b>GREEN MOUNTAIN CHRYSLER</b>	)	
<b>PLYMOUTH DODGE JEEP, et al.,</b>	)	
<b>Plaintiffs</b>	)	<b>Docket Nos. 02:05-CV-302</b>
	)	<b>02:05-CV-304</b>
	)	<b>(Consolidated)</b>
<b>v.</b>	)	
	)	
<b>George Crombie, et al.,</b>	)	
<b>Defendants</b>	)	
	)	
<b>GREENPEACE, INC.,</b>	)	
<b>Intervenor</b>	)	

**CERTIFICATE OF SERVICE**

This is to certify that on the 6th day of June, 2007, I, Abba Corliss, of Bergeron, Paradis & Fitzpatrick, Legal Assistant to Douglas G. Kallen, Esq., served a copy of the foregoing "Motion to Intervene of Dr. Patrick J. Michaels", "Dr. Patrick J. Michaels' Memorandum in Support of Motion to Intervene and Dr. Michaels' Opposition to Greenpeace Motion to Unseal Certain Records, or to Compel Showing of Confidentiality; and", "Affidavit of Dr. Patrick J. Michaels", by delivering a copy of same via First Class Mail to: Matthew B. Byrne, et al, Gravel and Shea, 76 St. Paul Street, 7<sup>th</sup> Floor, P. O. Box 369, Burlington, VT 05402-0369; and Lucas R. Blocher, et al, Kirkland & Ellis LLP, 655 15th Street, N.W., Suite 1200, Washington, D.C. 20005; and Charles H. Haake, et al, Gibson, Dunn & Crutcher, LLP, 1050 Connecticut Avenue, N.W., Washington, D.C. 20036; and Debra L. Bouffard, et al, Sheehey Furlong & Behm P.C., 30 Main Street, 6<sup>th</sup> Floor, Burlington, Vermont 05402-0066; and Erick E. Titrud, Vermont Attorney General's Office, Pavilion Office Building, 109 State Street, Montpelier, VT 05609-1001; and Kevin O. Leske, et al, Vermont Attorney General's Office, Environmental Unit, 109 State Street, Montpelier, VT 05609-1001; and Bradford W. Kuster, et al, Conservation Law Foundation, Vermont Advocacy Center, 15 East State Street, Suite 4, Montpelier, VT 05602; and David Bookbinder, Sierra Club, 408 C Street, N.E., Washington, D.C. 20002; and David D. Doniger, Natural Resources Defense Council, 1200 New York Avenue, N.W., Suite 400, Washington, D.C. 20005; and Matthew F. Pawa, et al, The Law Offices of Matthew F. Pawa, P.C., 1280 Centre Street, Suite 230, Newton Centre, MA 02459; and Melissa A. Hoffer, Conservation Law Foundation, 27 North Main Street, Concord, NH 03301; and Stephen F. Hinchman, Conservation Law Foundation, 14 Main Street, PMB #38, Brunswick, ME 04011; and James T. B. Tripp, Environmental Defense, 257 Park Avenue South, 17<sup>th</sup> Floor, New York, NY 10010; and John J. Sipos, New York State Office of the Attorney General, The Capitol, State Street, Albany, NY 12224; and Joseph J. Barbieri, California Attorney General's Office, 1515 Clay Street, Suite 2000, Oakland, California

94612; Robert G. Cain, et al, Paul Frank + Collins P.C., 1 Church Street, P. O. Box 1307, Burlington, VT 05402-1307; and Brian Dunkiel, Shems, Dunkiel, Kassel & Saunders, PLLC, 91 College Street, Burlington, VT 05401.

DATED AT Burlington, Vermont this 6th day of July, 2007.



Abba B. Corliss

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