

Iowa has long recognized that marriage, though an ancient social institution, is also a legal status/relationship defined and regulated according to public policy *by the Legislature*. The Applicants, members of the Iowa House of Representatives and of the Iowa Senate (collectively, “Iowa Legislators” or “Applicants”) have a unique and substantial interest in the outcome of this suit. It is an interest which will be seriously impaired by the disposition of this lawsuit, which is manifestly different than the original Defendant’s more ministerial interest, and which therefore cannot be represented adequately by the existing Defendant. Were this court to give Plaintiffs the relief they seek, the injury to separation of powers and thus to the interest of these Applicants would be complete, regardless of any subsequent legislative or citizen actions in reaction to the monumental change to Iowa law. Moreover, any change to the fundamental definition of marriage as the legal union of one man and one woman must be made through a process of legislative investigation and deliberation of the manifold legal, societal, budgetary, and economic consequences which would attend such a radical change. The Iowa Legislators respectfully urge this Court to let them intervene as Defendants to defend the Legislature’s prerogative regarding marriage.

INTERVENTION STANDARDS

The Iowa Code Annotated states that “[t]he amendments to former Iowa R. Civ. P. 75, now rule 1.407, adopted provisions substantially similar to Fed. R. Civ. P. 24 and allow the trial court more discretion in determining whether to allow intervention.” Iowa R. Civ. P. 1.407, Official Comment, Amendment 2001. In applying a state rule of procedure patterned after a federal rule, Iowa courts find that “federal interpretations are persuasive.” *Brody v. Ruby*, 267 N.W.2d 902, 904 (Iowa 1978), citing *Sherwood v. Nissen*, 179 N.W.2d 336, 339 (Iowa 1970).

Intervention under Iowa Rule 1.407, as under Fed. R. Civ. P. 24, is either of right (Rule 1.407(1)) or permissive (Rule 1.407(2)). Absent a statute conferring either an absolute or conditional right to intervene (compare Rule 1.407(1)(a) to Rule 1.407(2)(a)), the main distinction between intervention of right and permissive intervention is how directly the intervenor's interests are tied to the result of the litigation. Intervention of right must be granted where there is a practical possibility that the disposition of the action would impair or impede the intervenor's ability to protect a claimed interest relating to the subject matter of the action, and the intervenor's interest is not adequately represented by existing parties. Iowa Rule 1.407(1)(b). Permissive intervention can be granted where an intervenor's claim or defense shares a common question of law or fact with the main action. Iowa Rule 1.407(2)(b).

Rule 1.407(4) requires that “[t]he court shall grant interventions of right unless the applicant's interest is adequately represented by existing parties,” while “[t]he court shall consider applications for permissive intervention and grant or deny the application as the circumstances require.” Additionally, “[i]n exercising its discretion [as to permissive intervention], the court shall consider whether the intervention will unduly delay or prejudice the adjudication of the rights of the original parties.” Iowa R. Civ. P. 1.407(2). Iowa courts have long recognized that a generous view of intervention ultimately serves judicial economy: “intervention is remedial and is to be liberally construed to reduce litigation and expeditiously determine matters before the court.” *Rick v. Boegel*, 205 N.W.2d 713, 717 (Iowa 1973).

ARGUMENT AND AUTHORITY

I. INTERVENTION OF RIGHT IS PROPER.

The four elements required by Rule 1.407(1) for intervention of right are: (1) timely application; (2) applicants claim an interest in the subject matter of the action; (3) disposition of the action may as a practical matter impair or impede the applicants' ability to protect their interest; and (4) applicants' interest is not adequately represented by existing parties. The Iowa Legislators meet each of these requirements.

A. The Iowa Legislators' Application is Timely.

The Iowa Legislators' application to intervene is timely filed because it has been prepared and filed immediately following legislative developments placing the Legislature's interests at direct risk in this litigation. On March 23, 2006, the Iowa Senate's State Government Committee failed to send the Iowa Marriage Amendment, passed by the House in March 2005, to the floor of the Senate for a vote. The Iowa Marriage Amendment resolution, HJR 1, would have sent the voters of Iowa the following proposed constitutional amendment for approval:

Article I of the Constitution of the State of Iowa is amended by adding the following new section:

MARRIAGE. SEC. 26. Only marriage between a man and a woman shall be valid or recognized in the State of Iowa. The State of Iowa and its political subdivisions shall not create or recognize a legal status identical or substantially similar to that of marriage for unmarried individuals.

The Committee's failure to allow the full Senate to vote now requires the legislative process on the Iowa Marriage Amendment to start over from the beginning. Until this development, it seemed certain that the constitutional legislative process would moot the effort to redefine marriage in Iowa judicially through this litigation. As that is no longer viable for this

session of the Legislature, it is now imperative for these Legislators to intervene in the pending lawsuit to protect the Legislature's, and ultimately the people of Iowa's, prerogative to set marriage policy.

The Iowa Legislators' application to intervene is also timely when viewed from the standpoint of the original parties to this action, being filed before any further development of the case beyond initial pleadings. The action was filed on December 13, 2005, Plaintiffs granted an extension of time for responding, and Defendant timely answered on February 6, 2006. Applicants are not aware of any discovery having been conducted or any intent by the parties to conduct discovery. Based on review of the Court's online docket and conversations between Applicants' counsel and Defendant's counsel, Applicants are informed and believe that the parties are currently working on cross-motions for summary judgment with no set deadline for filing them. The Court has, however, recently noticed a Trial Scheduling Conference for April 14, 2006 at 8:15 a.m.

There appears to be no case law interpreting the timeliness element in the current version of Iowa's intervention rule. As noted, the rule closely tracks Fed. R. Civ. P. 24, so federal authority is persuasive. *Brody*, 267 N.W.2d at 904. "In determining timeliness [of a motion to intervene under Fed. R. Civ. P. 24], a court should consider how far the proceedings have progressed, prejudice to other parties from any delay, and the reason for any delay." *Taylor v. Southwestern Bell Telephone Co.*, 251 F.3d 735, 741 (8th Cir. 2001).

Here, the proceedings have not progressed beyond the filing of initial pleadings, with the Defendant's Answer having been filed only two months ago, with no filing activity in the meantime, and major deadlines in the case scheduled to be determined on April 14. Under the

circumstances, there is no reasonable basis for any claim that the Iowa Legislators' application to intervene is untimely.

The Iowa Legislators' timing in seeking to intervene is the result of caution followed by a change in circumstances. Until recently, with the litigation being so little developed, the Iowa Legislators have had little information from which to assess whether their interests would, as a practical matter, be represented adequately by the original Defendant. Thus they have taken a conservative position in evaluating whether they need to intervene and have the right to do so. Such caution was bolstered by the continuing viability of the Iowa Marriage Amendment in the Senate, keeping open the possibility of a legislative resolution until recently. Now, the Iowa Marriage Amendment passed by the House has been allowed to expire in committee in the Senate and the amendment process must await the next legislative session to restart. The Iowa Legislators are compelled by this development to intervene in this action to defend the Legislature's prerogative to set marriage policy in Iowa.

B. The Iowa Legislators Have a Substantial Interest in Whether Marriage Is Redefined to Include Same-sex Relationships, as Marriage Policy Is the Legislature's Prerogative.

It is ultimately up to the discretion of the court to decide whether a putative intervenor's interest in the proceedings is sufficiently direct to give a right to intervene. *See In Interest of A.G.*, 558 N.W.2d 400, 403 (Iowa 1997) ("This discretion [in ruling on intervention of right] is not the ability to deny intervention where the prerequisites of rule 75 [now Rule 1.407] have been met. Rather, this discretion is to be exercised on the question of whether an intervenor is 'interested' in the litigation"). The court's analysis of the applicant's interest is a flexible inquiry not restricted by fixed rules:

Our appellate courts have observed that the interest involved to support intervention must be derived from some legal right or liability which would be impacted by the judgment sought by the parties. A potential intervenor must typically have more than a speculative or contingent interest. No definitive or precise test exists to determine the sufficiency of the interest required for intervention. Instead, we approach the inquiry with flexibility, and focus on the circumstances of each case.

State ex rel. Miles v. Minar, 540 N.W.2d 462, 465 (Iowa App. 1995) (citations omitted).

Over 50 years ago, the Iowa Supreme Court declined to hold a common law marriage invalid in an estate contest challenging the common law wife's right to be recognized as the decedent's widow and administratrix. The Court's refusal was grounded on deference to the Legislature's authority over marriage, even as to legal aspects of marriage that first developed by common law rather than statutorily:

We have too long recognized the common-law marriage status in Iowa to change it by judicial decision. . . . There is a sound reason for adhering generally to settled principles of law. They should not be overturned lightly, nor unless they appear patently unsound and liable to cause mischief if uncorrected. The people should be able to know what the law is, and to order their affairs accordingly. We cannot abandon the rule of stare decisis except for far more impelling reasons than we find here. If the law as it has been settled by the courts and understood, not only by the legal profession but by the public generally, is to be changed, it is a task for the legislature.

In re Stopps' Estate, 244 Iowa 931, 935, 57 N.W.2d 221, 223 (1953) (emphasis added).

The courts of Iowa have long observed wise self-restraint from exercising judicial power to make policy decisions in violation of separation of powers, preserving our Nation's foundational commitment to a republican form of government. "Policy decisions . . . involve the weighing of the merits of social, political and economic factors traditionally held to be within the purview of the legislature. Judicial review of such decisions would be an apparent violation of

the separation of powers principle.” *Goodman v. City of Le Claire*, 587 N.W.2d 232, 236 (Iowa 1998).

Most fundamentally, the Legislature is entrusted with establishing public policy for the State. The Iowa Courts have long recognized that it is the province of the Legislature, not the courts, to determine public policy. The Legislature may choose to retain existing public policy or change it at will, providing the change does not violate the Constitution:

[T]he judicial branch of our government has no power to determine whether legislative Acts are wise or unwise, nor has it the power to declare an Act void unless it is plainly and without doubt repugnant to the Constitution. In fact so long as there is no constitutional defect, the legislature may enact any law, reflecting whatever social policy it desires.

Doe v. Ray, 251 N.W.2d 496, 503 (Iowa 1977) (citations omitted). *See also State v. Bruntlett*, 36 N.W.2d 450, 460 (Iowa 1949) (“The legislature, and not this court, declares the public policy of this state. . . . We are limited both by law and conscience to the judicial function of faithfully interpreting and applying the law as we find it.”), *overruled in part on other grounds, State v. Martin*, 55 N.W.2d 258 (Iowa 1952); *Board of Park Com'rs of City of Des Moines v. Diamond Ice Co.*, 105 N.W. 203, 205 (Iowa 1905) (“A legislative act, if constitutional, declares in terms the policy of the state and is final so far as the court is concerned”).

The Iowa Supreme Court has repeatedly noted the importance of marriage as a matter of public policy. In *Hopping v. Hopping*, 233 Iowa 993, 10 N.W.2d 87 (1943), the Court declared:

The integrity and permanence of the marital relation is of such vital importance to the welfare of society and to the public generally that the sovereignty or State has always deeply interested itself in all matters pertaining to the dissolution of that relation. While the suit for divorce is nominally between the two parties, the State is always a quasi party. As said in *Walker v. Walker*, 205 Iowa 395, 398, 217 N.W. 883, 885: “The nominal plaintiff and defendant are not the only parties to the suit. The state and public are parties by implication.” This concern on the part of the State is evinced by various statutory provisions. While marriage is spoken

of as a civil contract [cit.], it is also a social institution, which is the foundation of the family and society.

Hopping, 233 Iowa at 996-997, 10 N.W.2d at 89-90 (emphasis added). More recently, the Court noted that “[p]reservation of a marital relationship is a fundamental public policy. This is evident in our decisions, in Iowa statutes, and the ethical code for attorneys.” *Rogers v. Webb*, 558 N.W.2d 155, 157 (Iowa 1997). Indeed, the public policy in promoting and protecting marriage is so strong that it “makes any provision [in a contract] which provides for, facilitates or tends to induce a separation or divorce of the parties after marriage contrary to public policy and void.” *Rogers, id.*, quoting *Norris v. Norris*, 174 N.W.2d 368, 370 (Iowa 1970).

The Applicant Iowa Legislators have an exceedingly strong interest in the outcome of this litigation. The promotion of marriage is undoubtedly a deeply-rooted and fundamental public policy of the State of Iowa. The Legislators have a distinct and substantial interest in protecting the legislative branch’s recognized central role in shaping and maintaining marriage policy in the State of Iowa. The constitutional dignity of their offices as legislators and the Legislature’s prerogative to define marriage policy for the State of Iowa are directly implicated in this Court’s decision whether to grant the judgment sought by Plaintiffs and redefine marriage to include same-sex couples. This Court should find that the Iowa Legislators claim an interest in the subject matter of this litigation sufficient to entitle them to intervene as Defendants.

C. The Iowa Legislators’ Interest in Defining and Regulating Marriage Would Be Impaired by a Judgment Redefining Marriage to Include Same-sex Relationships.

The previous section amply demonstrates that marriage policy has “traditionally been held to be within the purview of the legislature” in Iowa, such that settled law on marriage is generally to be changed only by the Legislature and not through the courts. *Goodman*, 587

N.W.2d at 236. The social, political, legal, economic and budgetary factors implicated by a revolutionary redefinition of marriage to include same-sex couples are profound and pervasive. Weighing the merits and far-reaching consequences of such a sea-change in the law of marriage to the many areas of state law affected by marital status is a task for which the judiciary is not designed or equipped. Such policy analysis and deliberation are squarely within the assigned duties and core competencies of the Legislature in Iowa's constitutional separation of powers.

In this case the applicant Iowa Legislators' concern with the outcome of the litigation is obvious. If this court were to grant the Plaintiffs' requested relief and mandate that same-sex couples be permitted to obtain the legal status of marriage for their relationships, the Legislature would be required to make appropriations sufficient to pay the costs generated by the statewide change in scope of numerous laws for which marital status is a triggering factor. The Legislature would have to make a thoroughgoing review and revision of hundreds of state laws relating to marriage which have been adopted with society's common understanding that marriage is the legal union of a man and a woman uniquely involving procreation and child rearing. And all of this after the fact, rather than in the course of legislative deliberation of the wisdom and effects of making such a monumental change in the law.

It cannot be gainsaid that the Legislature has specifically rejected the public policy the Plaintiffs are demanding that the Court adopt. Although Iowa's marriage laws have always clearly extended only to opposite-sex unions, Iowa Code Ann. § 595.2 was amended in 1998 to reaffirm that "[o]nly a marriage between a male and a female is valid." *Id.*, subsec. (1). Plaintiffs' lawsuit is a direct frontal assault on the Legislature's prerogative (which it has already

exercised) to establish the most fundamental marriage policy of the state: its continuing embrace of human society's millennia-old definition of marriage as the union of a man and a woman.

Thus, Applicants' unique and significant interest as Iowa Legislators in protecting the Legislature's prerogative to define and regulate marriage will be directly impaired by a decision of this Court granting Plaintiffs the relief they seek. Such a ruling is a potential injury, a concrete one, to separation of powers principles in Iowa. The Iowa Legislators, as officeholders in the policymaking branch of the government, should be afforded the right to intervene and defend the settled policy choice to define marriage that the Iowa Supreme Court has recognized as belonging to the Legislature. *See In re Stopps' Estate, supra*, 57 N.W.2d at 221.

D. The Iowa Legislators' Interests in this Lawsuit Are Significantly Different than the Existing Defendant's Interest, and Thus Are Inadequately Represented by the Existing Defendant.

The only Defendant to this lawsuit, Timothy J. Brien, is the County Recorder for Polk County. His authority, when it comes to the definition and regulation of marriage under Iowa law, is essentially ministerial. His office is charged to determine whether the applicants for a marriage license are legally qualified for marriage under the laws of the State of Iowa. If so, his office is to issue the license according to the rules, regulations and procedures specified under Iowa law (using the proper forms, processing and recording them correctly, collecting the appropriate fees, etc.). To the extent that Defendant Brien is sued as the representative of Polk County more generally, Iowa counties are political subdivisions of the State, which also have no authority to change state marriage law. Again, counties may only enforce the marriage laws.

For the reasons set forth in the previous two sections, the Iowa Legislators have profoundly different interests that will be affected by the outcome of this litigation. They are

elected officeholders in the political body recognized to have the prerogative to define and regulate marriage under Iowa law. They are directly interested in preserving and protecting that prerogative and in asserting the public policy grounds that support Iowa's marriage laws.

“The adequacy of representation [by existing parties, in considering intervention of right] depends on the similarity of interests between the proposed intervenor and the parties already before the court.” *Taylor v. Southwestern Bell Telephone Co.*, *supra*, 251 F.3d at 741. “Typically, persons seeking intervention need only carry a ‘minimal’ burden of showing that their interests are inadequately represented by the existing parties.” *Mille Lacs Band of Chippewa Indians v. State of Minn.*, 989 F.2d 994, 999 (8th Cir. 1993).

This case presents the opposite side of the dilemma often occurring in intervention cases, in which private citizens seek to intervene in a matter of public importance where the State (or other government entity) is a named party. In such cases the interests of the citizens as members of the public are presumed, albeit rebuttably, to be protected adequately by the State, under the doctrine of *parens patriae*. See *Mille Lacs Band*, 989 F.2d at 999-1000. By contrast here, the original Defendant is a government representative, but only at the county level, and thus only with a ministerial interest implicated in the dispute over whether the definition of marriage should or must be changed statewide in Iowa. The putative intervenors, as members of the Iowa Legislature, would be the only parties to the litigation with a direct and substantial state-wide interest in defending Iowa's public policy on marriage. They would also be the only parties with interests arising from constitutional separation of powers principles at jeopardy in the disposition of this suit. Thus, although the Legislature's policymaking authority with regard to marriage is in jeopardy in this lawsuit, it is currently not being represented at all. “If applicant's interest is not

represented at all or if it is adverse to that of the existing party, representation is inadequate.” *Habitat Ed. Center, Inc. v. Bosworth*, 221 F.R.D. 488, 495 (E.D. Wis. 2004).

Given the applicant Iowa Legislators’ direct and substantial interests in defending Iowa’s declared public policy on marriage and in protecting separation of powers, Applicants respectfully urge this court to find that the existing Defendant Brien cannot adequately represent their interests. Applicants have more than made the “minimal” showing of inadequate representation justifying intervention of right under Rule 1.407(1).

II. PERMISSIVE INTERVENTION WOULD BE PROPER.

Iowa courts have not construed the criteria for permissive intervention under the current intervention statute, which states that permissive intervention may be granted “[w]hen an applicant’s claim or defense and the main action have a question of law or fact in common.” Iowa Rule 1.407(2)(b). Under Iowa Rule 1.407(4), “[t]he court shall consider applications for permissive intervention and grant or deny the application as the circumstances require.” Thus, Rule 1.407(2) gives this court extremely broad discretion to permit an applicant to intervene and be heard on the matter before the court. “The grant or denial of permissive intervention is in the discretion of the trial court.” *U.S. v. Union Elec. Co.*, 64 F.3d 1152, 1170 (8th Cir. 1995).

Iowa R. Civ. P. 1.407(2) requires that, “[i]n exercising its discretion [as to permissive intervention], the court shall consider whether the intervention will unduly delay or prejudice the adjudication of the rights of the original parties.” As explained Section I(A) above, this case has not progressed to a point where there can be any legitimate complaint that affording the Iowa Legislators the right to be heard on the constitutionality of the marriage laws will unduly delay or prejudice the adjudication of the rights of the original parties. After all, this suit seeks a court

order redefining in Iowa law the basic makeup of one of the most ancient institutions on which human society is based. The original parties cannot reasonably have expected that it would be adjudicated in a rushed or summary manner, and this Application has been filed before the holding of a scheduling conference or entry of any deadline order.

Plaintiffs' lawsuit claims that the Iowa Constitution's guarantees of due process and equal protection of the laws require that the legal status of marriage be available to same-sex couples as it is to opposite-sex couples. Common questions of law and fact at issue in the main action that will be addressed by the Iowa Legislators include whether same-sex "marriage" is a fundamental liberty interest, whether Plaintiffs can carry their burden of proving that they are similarly situated with married couples, and whether Iowa's marriage laws are supported by rational bases.

Under the circumstances, this Court clearly has the discretion to permit the Iowa Legislators to intervene under Iowa Rule 1.407(2).

CONCLUSION

This case involves a political battle that the Plaintiffs have brought to this Court under the guise of state constitutional due process and equal protection claims. Their lawsuit seeking a judicial redefinition of marriage is a direct challenge to the Iowa Legislature's prerogative to define and regulate marriage. Under the circumstances, the Court should grant the Iowa Legislators' motion to intervene of right. In the alternative, the Court should grant permissive intervention.

Respectfully submitted this 6th day of April, 2006.

Timm W. Reid (PK1000016)
IOWA LIBERTY AND JUSTICE CENTER
The Plaza
300 Walnut Street, Suite 5
Des Moines, Iowa 50309-2239
(515) 282-3333
(515) 282-0318 [FAX]

Benjamin J. Bull*
AZ Bar No. 009940
Glen Lavy*
AZ Bar No. 022922
Christopher R. Stovall*
GA Bar No. 621780
[By Timm. W. Reid w/express permission]
ALLIANCE DEFENSE FUND
15333 North Pima Road, Suite 165
Scottsdale, Arizona 85260
(480) 444-0020
(480) 444-0028 [FAX]

*pending admission *pro hac vice*

Attorneys for Applicant Iowa Legislators

represented by existing parties. These grounds are supported under oath in the Affidavits of the Applicants attached hereto as a collective Exhibit "2" and incorporated by reference. The reasons for granting intervention, as explained more fully in the *Brief in Support of Iowa Legislators' Application to Intervene as Defendants* (filed of even date and incorporated here by reference as if set forth in full), are as follows:

1. Applicants, members of both houses of the Iowa Legislature, have an interest in protecting separation of powers against efforts by litigants to employ the judicial power of the State in altering fundamental public policies within the prerogative of the Legislature.

2. Applicants believe the definition of marriage, especially in terms of what relationships may obtain such legal status, is a public policy issue committed by law to the province of the Legislature. It has always been the public policy of the State of Iowa that marriage is the union of a man and a woman, but Plaintiffs seek a judgment from this Court that same-sex couples must be permitted to marry.

3. If this lawsuit is decided adversely to Applicants without their participation, their interest as members of the Iowa Legislature in establishing social policy, controlling the budget in response to current social policy, and maintaining the consistency of Iowa's laws with declared social policy will be impeded.

4. Defendant Timothy J. Brien, although presumed as the Polk County Recorder and Polk County Registrar to fulfill his duties of faithfully executing and upholding Iowa marriage law so far as regards the responsibilities committed to his office, is not invested with any authority to set or change state marriage policy. To the extent that Polk County is effectively a party to this action by virtue of the suit against Defendant Brien in his official capacity, the

county, as a political subdivision of the State, likewise is not invested with any authority to set or change state marriage policy.

5. Given the Applicant Iowa Legislators' direct and substantial interests in defending Iowa's declared public policy on marriage and in protecting separation of powers, Applicants respectfully assert that the existing Defendant Brien cannot adequately represent their interests.

6. The Iowa Legislators bring this Application in a timely fashion. The case has not yet progressed beyond the filing of responsive pleadings. The Application is filed before the Court holds a scheduling conference, currently set for Friday, April 14, 2006 at 8:15 a.m. The Application has been filed as soon as possible after the failure of the Iowa Marriage Amendment to be presented to the full Senate for a vote. That event created an urgency for members of the State's legislative branch to be heard in this proceeding in defense of the Legislatures' prerogative over marriage policy.

In the alternative, the grounds for this Application are that Applicants' defenses and the main action have questions of law and fact in common and that the intervention will not unduly delay or prejudice the adjudication of the rights of the original parties for the following reasons:

1. Common questions of law and fact at issue in the main action that will be addressed by the Iowa Legislators include whether same-sex "marriage" is a fundamental liberty interest, whether Plaintiffs are similarly situated with married couples, and whether Iowa's marriage laws are supported by rational bases.

2. Intervention will not unduly delay or prejudice the adjudication of the rights of the original parties because the litigation has not progressed beyond the filing of responsive

pleadings, and this motion is being filed prior to the initial trial scheduling conference or the filing of any dispositive motions.

Respectfully submitted this 6th day of April, 2006.

Timm W. Reid (PK1000016)
IOWA LIBERTY AND JUSTICE CENTER
The Plaza
300 Walnut Street, Suite 5
Des Moines, Iowa 50309-2239
(515) 282-3333
(515) 282-0318 [FAX]

Benjamin J. Bull*
AZ Bar No. 009940
Glen Lavy*
AZ Bar No. 022922
Christopher R. Stovall*
GA Bar No. 621780
[By Timm. W. Reid w/express permission]
ALLIANCE DEFENSE FUND
15333 North Pima Road, Suite 165
Scottsdale, Arizona 85260
(480) 444-0020
(480) 444-0028 [FAX]

*pending admission *pro hac vice*

Attorneys for Applicant Iowa Legislators