

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

UNITED STATES OF AMERICA ex rel.	)	
JOSHUA HARMAN,	)	
	)	Civil Action No. 2:12-CV-89
Plaintiff,	)	
	)	
v.	)	
	)	
TRINITY INDUSTRIES, INC, and	)	
TRINITY HIGHWAY PRODUCTS, LLC,	)	
	)	
Defendants.	)	

**MOTION TO INTERVENE OF THE CENTER FOR AUTO SAFETY AND  
THE SAFETY INSTITUTE**

For the reasons set forth in the accompanying Brief in Support of Motion to Intervene, the Center for Auto Safety and The Safety Institute respectfully ask this Court to permit them to intervene in the above-captioned case under Fed. R. Civ. P. 24(b)(1) for the limited purpose of seeking to unseal documents filed in the case. A proposed order is attached.

Respectfully submitted,

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Attorneys for Intervenors

### CERTIFICATE OF SERVICE

I certify that a true copy of the above and foregoing document was served on each attorney of record or party in accordance with the Federal Rules of Civil Procedure on the 15<sup>th</sup> day of August, 2014, as indicated below to:

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/s/ David T. Bright  
\_\_\_\_\_  
David T. Bright

**CERTIFICATE OF CONFERENCE**

I hereby certify that I, counsel for The Center for Auto Safety and The Safety Institute has complied with Local Rule CV-7(H) and conferred with counsel for Plaintiff and Defendants by telephone on August 14, 2014 concerning this Motion to Intervene. Counsel for Plaintiff, Teresa Monroe, indicated that Plaintiff is neither opposed to, or in agreement with, the merits of this motion. Counsel for the Trinity Defendants, Sarah Teachout, indicated that the Trinity Defendants object to the unsealing of any record relating to this case, and are therefore opposed to the Motion to Intervene. Accordingly, the parties are unable to reach an agreement on the merits of the Motion to Intervene and the Court's intervention is necessary.

/s/ Jerry M. White  
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Jerry M. White

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Defendants.	)	

**[PROPOSED] ORDER**

The Court GRANTS The Center for Auto Safety and The Safety Institute’s Motion to Intervene for the limited purpose of seeking to unseal court documents.