

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

AMERICAN ALLIANCE FOR EQUAL  
RIGHTS, a nonprofit corporation,

Plaintiff,

v.

KAY IVEY, in her official capacity as Governor  
of the State of Alabama,

Defendant.

Civil Action No. 2:24-cv-00104-RAH- JTA

**MOTION TO INTERVENE**

Pursuant to Federal Rule of Civil Procedure 24, Proposed Intervenor, the Alabama Association of Real Estate Brokers, a trade association and civil rights organization for Black real estate professionals, hereby moves to intervene.

Proposed Intervenor seeks to participate in this case to present a fulsome defense of the legality and enforceability of the two statutory requirements related to representation and inclusivity on Alabama’s Real Estate Appraiser’s Board (“Appraisers Board”). Together, these provisions aim to remedy the legacy of racial discrimination in the housing and lending industry and ensure that members of the Appraisers Board are accountable and represent the communities that they serve. These aims are core to Proposed Intervenor’s mission of “Democracy in Housing,” and critical to its members as well.

As detailed in the accompanying memorandum, Proposed Intervenor satisfies each of the requirements for intervention as of right under Fed. R. Civ. P. 24(a). If the Court declines to grant intervention as of right, Proposed Intervenor alternatively requests that the Court grant permissive intervention under Fed. R. Civ. P. 24(b).

Respectfully submitted,

/s/ Martin E. Weinberg

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 26, 2024, I electronically filed a copy of the foregoing with the Clerk of the Court via CM/ECF which will send notification to all counsel of record.

/s/ Martin E. Weinberg  
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