

standing and are perhaps in a better position to establish standing than other of the plaintiffs. The League of Women Voters is a nonpartisan group with members of all ages, political parties, socio-economic levels, race and ethnic backgrounds. No other plaintiff has as broad a base of membership. Should other plaintiffs be dismissed from the action for lack of standing, the Petitioners are concerned about the adequate representation of persons who will be impacted by Senate Enrolled Act No. 483 (“SEA 483”).

b. The female members of the Petitioners will be impacted by SEA 483. Indiana law now allows challengers to stand next to the table where voters will be asked to show identification. Females whose names may appear hyphenated on the voting lists but not on their photo identification are subject to challenge as are women who may use their maiden name for work and voter registration but not on their photo identification. Other examples of impact upon women include women whose hair color is different than the color of their hair in their photo identification thereby making them subject to challenge as will all women who may physically appear different from their photo identification.

c. Petitioners understand the court’s concern regarding duplicative arguments and are willing to incorporate arguments from the briefs of other counsel in addition to following the Court’s limitation on page numbers.

d. Petitioners believe the issues raised by SEA 483 go to the core of why the League of Women Voters was created - to encourage active and informed citizen participation in governmental affairs, with voting and voter's rights forming the very base upon which such participation is founded. The League of Women Voters testified against

SEA 483 when it was before the Indiana legislature and nationally, has opposed legislation of this type in other states. It is likely that this matter will ultimately be decided by a higher court and if the League of Women Voters is not allowed to intervene at this time, it cannot necessarily continue its fight.

e. Petitioners share the concern of the parties and the Court that this matter be handled expeditiously so as to allow a decision to be rendered before the next election and for this reason, although Petitioners could have filed a separate suit and asked to be consolidated with this action, instead chose to seek intervention so as to not slow down the process.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of October, 2005, a copy of the foregoing pleading was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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