

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

THE NORTHWEST AUSTIN	)	
MUNICIPAL UTILITY DISTRICT	)	
NUMBER ONE,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 1:06-CV-01384
	)	(PF, ES, DT)
ALBERTO GONZALES,	)	
Attorney General of the United States,	)	
	)	
Defendant,	)	
	)	
PEPOLE FOR THE AMERICAN WAY	)	
	)	
Applicant for Intervention	)	

**ANSWER OF INTERVENOR PEOPLE FOR THE AMERICAN WAY**

NOW COMES People for the American Way, Defendant-Intervenor (“PFAW”)

in the above-captioned action, and answer Plaintiff’s Complaint as follows:

1. Admit.
2. Denied.
3. Admit.
4. Admit.
5. Admit.
6. PFAW is without knowledge or information sufficient to form a belief as to the truth of the allegations asserted and on that basis denies the allegations of this Paragraph.
7. This Paragraph states a legal conclusion to which no response is required. To the extent a response is required, PFAW denies the allegations of this

Paragraph.

8. Denied.

9. Denied.

10. Denied.

11. Denied.

12. Denied.

13. Denied.

14. This Paragraph states a legal conclusion to which no response is required. To the extent a response is required, PFAW denies the allegations of this Paragraph.

15. PFAW is without knowledge or information sufficient to form a belief as to the truth of the allegations asserted and on that basis denies the allegations of this Paragraph.

16. PFAW is without knowledge or information sufficient to form a belief as to the truth of the allegations asserted and on that basis denies the allegations of this Paragraph.

17. PFAW is without knowledge or information sufficient to form a belief as to the truth of the allegations asserted and on that basis denies the allegations of this Paragraph.

18. This Paragraph states a legal conclusion to which no response is required. To the extent a response is required, PFAW denies the allegations of this Paragraph.

19. Denied.

20. Denied.

21. Denied.

22. Denied.

23. Denied.

24. Denied.

25. PFAW is without knowledge or information sufficient to form a belief as to the truth of the allegations asserted and on that basis denies the allegations of this Paragraph.

26. Denied.

Respectfully submitted,

/s/ Elliot M. Minberg

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Elliot M. Minberg (D.C. Bar No. 941575)  
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Attorneys for Proposed  
Defendant-Intervenor  
Dated: November 2, 2006

**CERTIFICATE OF SERVICE**

I hereby certify that on this 2<sup>nd</sup> day of November 2006, I caused a true and correct copy of the Motion of People For the American Way to Intervene as Defendant, Memorandum Of Points And Authorities In Support Of Motion To Intervene As Defendant On Behalf Of People For The American Way, Order, and Answer of Intervenor People For the American Way to be served on all counsel of record by sending a copy via electronic mail and first-class mail, postage prepaid, addressed to all of the counsel listed below:

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*Counsel for Defendant Alberto R.*

/s/ Elliot M. Minberg

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Elliot M. Minberg