

ABBOTSFORD EDUCATION
ASSOCIATION, et al.,

Plaintiffs,

Case No. 23-CV-3152

v.

WISCONSIN EMPLOYMENT
RELATIONS COMMISSION, et al.,

Defendants.

**NOTICE OF MOTION AND RENEWED MOTION
TO INTERVENE AS DEFENDANT**

PLEASE TAKE NOTICE that Proposed Intervenor-Defendant, Kristi Koschkee, pursuant to Wis. Stat. § 803.09(1), this Court's order of January 29, 2024, and this Court's inherent power, renews her motion to this Court for leave to intervene as a matter of right in the above-captioned case. This Court previously agreed to hold Ms. Koschkee's motion to intervene in abeyance until such time as Ms. Koschkee was prepared to demonstrate inadequate representation. As representation of Ms. Koschkee's interests has now become inadequate, Ms. Koschkee renews her motion to intervene so that she may appeal from the December 2, 2024, order of this Court granting the Plaintiffs' motion for judgment on the pleadings.

The basis for this motion, which is set forth in greater detail in the accompanying Memorandum of Law in Support of Renewed Motion to Intervene as Defendant, is that Ms. Koschkee is a public school teacher who timely claims interests relating to the property or transaction which is the subject of this action and is so

situated that the disposition of the action may as a practical matter impair or impede her ability to protect those interests. *See* Wis. Stat. § 803.09(1). Further, the representation of those interests by existing parties has become inadequate. *See id.*

Also accompanying the motion is the Declaration of Kristi Koschkee and a Proposed Order. Finally, Ms. Koschkee supports this Motion with the materials she previously filed with her original motion to intervene on January 29, 2024.

Dated: December 11, 2024

Respectfully Submitted,

WISCONSIN INSTITUTE
FOR LAW & LIBERTY

Electronically signed by Lucas T. Vebber

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