

**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,

/s/ David T. Bright _____
David T. Bright
TBN 02991190
Sico White Hoelscher Harris & Braugh LLP
900 Frost Bank Plaza
802 N. Carancahua Suite 900
Corpus Christi, TX 78401
Phone: 361-653-3300
dbright@swhhb.com

Leslie A. Brueckner
(*pro hac vice* admission pending)
Public Justice, P.C.
555 12th Street, Suite 1230
Oakland, CA 94607
Phone: (510) 622-8150
Fax: (510) 622-8155
lbrueckner@publicjustice.net

Jerry M. White
TBN 21308700
Turner & Associates, P.A.
4705 Somers Avenue, Suite 100
North Little Rock, AR 72116
Phone: (510) 791-2277
jerry@tturner.com

Attorneys for Intervenors

CERTIFICATE OF SERVICE

I certify that a true copy of the above and foregoing document was served one each attorney of record or party in accordance with the Federal Rules of Civil Procedure on the 14th day of August, 2014, as indicated below to:

Attorneys for United States of America re: Joshua Harman:

Barrett E. Pope
Wyatt B. Durette, Jr.
Debbie G. Seidel
Durette Crump PLC
1111 E. Main Street, 16th Floor
Richmond, Virginia 23219
bpope@durettecrump.com
wdurette@durettecrump.com
dseidel@durettecrump.com

Christopher M. Green
Boies, Schiller & Flexner
333 Main Street
Armonk, New York 10504
cgreen@bsflp.com

George F. Carpinello
Jeffrey S. Shelly
Teresa A. Monroe
Boies, Schiller & Flexner, LLP
30 South Pearl Street, 11th Floor
Albany, New York 12207
gcarpinello@bsflp.com

George R. Coe
Karen Dyer
Boeis, Schiller & Flexner, LLP
121 South Orange Avenue, Suite 830
Orlando, Florida 32801
gcoe@bsfllp.com
kdyer@bsfllp.com

J. Kevin McClendon
U.S. Attorney's Office – Plano
101 E. Park Blvd, Suite 500
Plano, Texas 75074
kevin.mcclendon@usdoj.gov

Josh B. Maness
P.O. Box 1785
Marshall, Texas 75671
manessjosh@hotmail.com

Justin Kurt Truelove
Truelove Law Firm, PLLC
100 West Houston
Marshall, Texas 75670
kurt@truelovelawfirm.com

Nicholas A. Gravante, Jr.
Boies, Schiller, & Flexner, LLP
575 Lexington Avenue, 7th Floor
New York, New York 10022
ngravante@bsfllp.com

Steven R. Lawrence
The Lawrence Law Firm
700 Lavaca Street, Suite 1400
Austin, Texas 78701
steven@stevenlawrencelaw.com

T. John Ward
Ward & Smith Law Firm
P.O. Box 1231
Longview, Texas 75606
tjw@wsfirm.com

Sam Baxter
McKool Smith, P.C.
104 East Houston Street, Suite 300
Marshall, Texas 75670
sbaxter@mckoolsmith.com

Attorneys for Defendants Trinity Industries, Inc. and/or Trinity Highway Products, LLC:

Ethan L. Shaw
John Cowart
Shaw Cowart, LLP
1609 Shoal Creek Blvd., Suite 100
Austin, Texas 78701
elshaw@shawcowart.com

Matthew B. Kirsner
Eckert, Seamans, Cherin & Mellott, LLC
707 E. Main Street, Suite 1450
Richmond, Virginia 23219
mkirsner@eckertseamans.com

Russell C. Brown
Law Office of Russell C. Brown, P.C.
P.O. Box 1780
Henderson, Texas 75653-1780
russell@rcbrownlaw.com

Heather Bailey New
Bell, Nunnally & Martin, LLP
3232 McKinney Avenue, Suite 1400
Dallas, Texas 75240
heathern@bellnunnally.com

James Mark Mann
Mann, Tindel & Thompson
300 W. Main
Henderson, Texas 75652
mark@themannfirm.com

Mike C. Miller
Attorney at Law
201 W. Houston
Marshall, Texas 75670
mikem@millerfirm.com

Sarah R. Teachout
Akin, Gump, Strauss, Hauer & Feld, LLP
1700 Pacific Avenue, Suite 4100
Dallas, Texas 75201-4624
steachout@akingump.com

Wendy West Feinstein
Eckert, Seamans, Cherin & Mellott, LLC
600 Grant Street, 44th Floor
Pittsburgh, Pennsylvania 15219
wfeinstein@eckertseamans.com

Attorney for Movant Structural & Steel Products, Inc.:

Eric J. Millner
Bourland, Wall & Wenzel
301 Commerce Street, Suite 1500
Fort Worth, Texas 76102
emillner@bwwlaw.com

/s/ David T. Bright _____
David T. Bright