

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NEW YORK

BLACK LOVE RESISTS IN THE RUST, *et al.*,
individually and on behalf of a class of all others
similarly situated,

Plaintiffs,

v.

CITY OF BUFFALO, N.Y., *et al.*,

Defendants.

No. 1:18-cv-00719-CCR

**NOTICE OF MOTION TO INTERVENE AS PLAINTIFFS AND
REPRESENTATIVES OF THE TRAFFIC ENFORCEMENT CLASS**

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 24, Plaintiffs, along with Markel Nance and Thomas Christopher Williams Jr. (together, the “Proposed Intervenors” or the “Intervenors”), by their undersigned attorneys, will move the Court at the United States Courthouse for the Western District of New York, 2 Niagara Square, Buffalo, NY 14202, at a date and time to be determined by the Court, for an Order granting Plaintiffs’ and the Proposed Intervenors’ Motion to Intervene as Plaintiffs and Representatives of the Traffic Enforcement Class.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Plaintiffs and the Proposed Intervenors will rely on the accompanying Memorandum of Law, Declaration of Andrew J. Timmick with exhibits, Declarations of Markel Nance and Thomas Christopher Williams Jr., and all pleadings and proceedings on file.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Rule of Civil Procedure 7(a)(1), Plaintiffs hereby state that they intend to file and serve reply papers. Pursuant to Local Rule of Civil Procedure 7(b)(2)(B), if the Court does not set deadlines by

order, any opposition will be due within fourteen days of service of this Motion, and any reply papers will be due within seven days of service of the opposition papers.

Dated: July 11, 2025

Respectfully Submitted,



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