

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

Orange County Rescue Squad, Inc.,)	
a non-profit North Carolina Corporation,)	
on behalf of itself and others similarly situated,)	Case No. 1:09-cv-244
)	
-and-)	
)	
Gary Clark,)	
on behalf of himself and others similarly situated,)	
)	
Plaintiffs,)	
)	
vs.)	
)	
County of Orange, a county existing)	
under the laws of the State of North Carolina,)	
)	
-and-)	
)	
Colonel F. Rojas Montes de Oca, Jr.,)	
Orange County Emergency Services Director,)	
in his official capacity,)	
)	
Defendants.)	

Motion To Add Party Joining An Additional Plaintiff

Pursuant to Federal Civil Rules of Procedure 15, 19, 20 and 21 and Middle District of North Carolina Local Rule 7.3(j)(4), plaintiff respectfully moves for leave to add a party joining an additional plaintiff to the first amended complaint, adding Gary Clark as a party plaintiff as a class representative to the class action. Gary Clark is added as a class representative because he is a potential recipient of service from Orange County EMS and is domiciled inside Orange County, and an Orange County tax payer.

WHEREFORE, Plaintiff Orange County Rescue Squad, Inc. requests this honorable court to grant the instant motion to add party joining an additional plaintiff, adding Gary Clark as a party plaintiff as putative class representative.

Respectfully Submitted,

This 14th Day of June, 2009.

/s/Jeremy Todd Browner
Jeremy Todd Browner, Esq., (0038941)
Attorney for Plaintiff Orange County Rescue Squad, Inc.
and Proposed Plaintiff Gary Clark
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CERTIFICATE OF SERVICE

This is to certify that the undersigned has this 14th day of June, 2009, served this Motion To Add Party Joining An Additional Plaintiff upon all other parties to this cause by depositing a copy hereof, postage paid, in the United States mail, addressed to the attorney for said parties as follows:

Annette M. Moore, Esq.
Staff Attorney
Orange County
PO Box 8181
Hillsborough, NC 27578
Attorney for Orange County and Col. Montes de Oca, in his official capacity

LAW OFFICE OF JEREMY TODD BROWNER, PLLC

BY: /s/Jeremy Todd Browner
Jeremy Todd Browner, Esq.