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Subject: Notification of Service for Case No. 18-2015-CV-00240 (Public Service Commission, et al. vs. Grand Forks Bean Company, Inc.)

This is a service filing for Case No. 18-2015-CV-00240, Public Service Commission, et al. vs. Grand Forks Bean Company, Inc..

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**Notification of service – Notice of Motion and
Bremer Bank, National Association's Motion to
Intervene**

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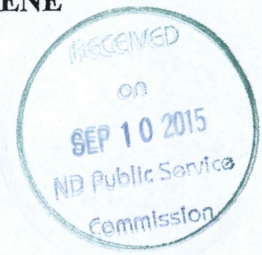
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IN DISTRICT COURT, GRAND FORKS COUNTY, STATE OF NORTH DAKOTA

Public Service Commission,)
)
 Petitioner,)
)
 vs.)
)
 Grand Forks Bean Company, Inc.,)
 Auto-Owners Insurance Company,)
)
 Respondents,)
)
 vs.)
)
 Bremer Bank, National Association,)
)
 Applicant for Intervention.)
 _____)
 PSC Case No. GE-15-36)

Civil No. 18-2015-CV-00240

**RULE 3.2 NOTICE OF MOTION,
AND BREMER BANK,
NATIONAL ASSOCIATION'S
MOTION TO INTERVENE**



NOTICE

TO: PETITIONER PUBLIC SERVICE COMMISSION, BY AND THROUGH ITS ATTORNEYS ILLONA A. JEFFCOAT-SACCO, MITCH ARMSTRONG, AND BRIAN SCHIMIDT; RESPONDENT GRAND FORKS BEAN COMPANY, INC., BY AND THROUGH ITS ATTORNEY JOEL ARNASON; RESPONDENT AUTO-OWNERS INSURANCE COMPANY, BY AND THROUGH ITS ATTORNEY MICHAEL J. MORLEY; AND OTHER INTERESTED PERSONS BY AND THROUGH THEIR ATTORNEYS:

¶1. PLEASE TAKE NOTICE this motion is brought pursuant to Rule 24 of the North Dakota Rules of Civil Procedure and Rule 3.2 of the North Dakota Rules of Court. You are put on notice that you have 14 days after service of a brief within which to serve and file an

answer brief and other supporting papers. Bremer Bank, National Association may serve and file a reply brief within seven days after service of the answer brief. Upon the filing of briefs, or upon expiration of the time for filing, the motion is deemed submitted to the court unless counsel for any party requests oral argument on the motion. Requests for oral argument or the taking of testimony must be made not later than seven days after expiration of the time for filing the answer brief. Please take notice that failure to file a brief in objection to the Motion may be deemed an admission that the Motion to Intervene is meritorious. Bremer Bank, National Association does not request oral argument before this Court. If you wish to have oral argument on the Motion you must make a timely request to do so and you must secure a time for the argument and serve notice upon all other parties of the time.

MOTION

¶2. COMES NOW Bremer Bank, National Association and moves the court for an order permitting Bremer Bank, National Association to intervene as a Respondent in this matter and to file the attached Answer to Application for Appointment as Trustee, Counterclaim, and Crossclaim. This Motion is brought pursuant to North Dakota Rule of Civil Procedure 24 as Bremer Bank, National Association claims an interest relating to the property or transaction that is the subject of this action, and is so situated that disposing of this action may as a practical matter impair or impede its ability to protect its interest.

¶3. This Motion is based on the Brief filed in support of the Motion, the Affidavit of Kevin Beito filed in support of the Motion, and on all pleadings and records on file with the court. Attached hereto as Exhibit 1 is Bremer Bank, National Association's intended pleading that sets out the claims and defenses for which intervention is sought, as required by Rule 24(c).

Dated this 9 day of September, 2015.



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