

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA,	)	
	)	
<i>Plaintiff,</i>	)	
	)	
v.	)	
	)	Civil Action No.: 19-0519
SAFEHOUSE, a Pennsylvania nonprofit	)	
corporation;	)	
	)	
JOSE BENITEZ, as Executive Director of	)	
Safehouse,	)	
	)	
<i>Defendants.</i>	)	

**EXPEDITED MOTION TO INTERVENE AS PARTY-PLAINTIFFS**

A group of twenty organizations (the “Community Groups” or the “Groups”)<sup>1</sup> hereby move to intervene as party-plaintiffs pursuant to Federal Rules of Civil Procedure 24(a)(2) and 24(b)(1)(B). In support of their motion, the Community Groups respectfully submit a memorandum of law and proposed order.

Pursuant to Federal Rule of Civil Procedure 6(c)(1)(C), the Community Groups respectfully request expedited consideration of this motion to allow the Groups to participate in settlement discussions among the parties.

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<sup>1</sup> The Community Groups are the Delancey Square Town Watch, East Passyunk Avenue Business Improvement District, Fraternal Order of Police, Lodge #5, Friends of Harrowgate Park, Friends of Penrose, Girard Estate Area Residents, Harrowgate Civic Association, Holme Circle Civic Association, Juniata Park Civic Association, Kensington Independent Civic Association, North of Washington Avenue Coalition, Packer Park Civic Association, Point Breeze Community Development Coalition, Port Richmond On Patrol And Civic, Queen Village Neighbors Association, Somerton Civic Association, South Broad Street Neighborhood Association, South Philadelphia Business Association, South Port Richmond Civic Association, and the Whitman Council.

Pursuant to Local Rule 7.1(f), the Community Groups respectfully request expedited oral argument to aid the Court in consideration of this motion.

Dated: April 11, 2023

By: /s/ Michael H. McGinley

Steven B. Feirson (PA # 21357)  
Michael H. McGinley (PA # 325545)  
DECHERT LLP  
Cira Centre  
2929 Arch Street  
Philadelphia, PA 19104  
Telephone: (215) 994-4000  
Facsimile: (215) 994-2222

Eric D. Hageman\*  
M. Scott Proctor\*  
Justin W. Aimonetti\*  
DECHERT LLP  
1900 K Street Northwest  
Washington, DC 20006  
\* *Motions to appear pro hac vice pending*

*Attorneys for Proposed Intervenor-  
Plaintiffs*