

No.: 14-562

*In the Supreme Court of the United States*

VALERIA TANCO, ET AL., PETITIONERS

(Petitioners)

v.

WILLIAM EDWARD "BILL" HASLAM, ET AL.

(Respondents)

Chris Sevier

Intervening Plaintiff-Petitioner

---

**MOTION TO INTERVENE AS PARTY RESPONDENT**

---

*"Make a career of humanity. Commit yourself to the noble struggle for equal rights. You will make a better person of yourself, a greater nation of your country, and a finer world to live in." DR. King March for Integrated Schools, April 18, 1959.*

<http://www.churchofthehighlands.com/media/message/ancient-family>

**TABLE OF CONTENTS**

TABLE OF CASES

.....  
i  
I. INTRODUCTION ..... 1  
II. REQUEST TO INTERVENE REJECTION BY THE PETITIONERS COULD SINGLE  
HANDEDLY PUT A STAKE IN THE HEART OF THE CASE ..... 7  
III. PROCEDURAL HISTORY ..... 9  
A. Consolidation Attempt with 3:13-cv-0607 ..... 9  
.....

B. Prior Intervention Attempts Here	10
.....	10
IV. SLIPPERY SLOPES, OPENING DOORS, EVIDENCE THAT DEMANDS A VERDICT	11
.....	11
V. INTERVENTION SHOULD BE ALLOWED GIVEN THE IMPLICATIONS OF SEVIER VS. CUOMO BEFORE THE COURT THAT PRODUCED WINSOR 14-cv-5380	13
.....	13
VI. ANIMUS	15
.....	15
VII. FREEDOM AND TRUTH	17
.....	17
VIII. THE UNEXAMINED ASSUMPTION OF THE SUPERIORITY OF OUR CULTURAL MOMENT	19
.....	19
IX. WITHOUT A FAITH BASIS, THERE IS NO BASIS FOR MORALITY, WITHOUT MORALITY THERE IS NO BASIS FOR LAW	20
.....	20
X. CLASS PROTECTION IS AN ALL OR NOTHING THING	23
.....	23
XI. INESCAPABLE EVIDENCE OF RACISM DEMONSTRATED BY THE PLAINTIFFS THAT IS NOW PART OF THE PERMANENT RECORD FOREVER THAT THE COURT CANNOT IGNORE	24
.....	24
XII. THE TRUE MINORITIES INTEREST ARE BEING LEFT OUT	27
.....	27
XIII. MODERN FAMILY VS ANCIENT FAMILY	34
.....	34
XIV. THE LEGAL STANDARD INDICATES INTERVENTION SHOULD BE ALLOWED	36
.....	36
XV. SUSPECT CLASS IN THE 6TH	38
.....	38
XVI. CHALLENGING THE RESPONDENTS' POSITION	38
.....	38
XVII. GENDER MATTERS	41
.....	41
XVIII. THE MODERN DAY SLAVERY ISSUE IS NOT "GAY RIGHTS" IT IS HUMAN TRAFFICKING	42
.....	42
XIX. LEVELING WITH THE COURT	42
.....	42

## TABLE OF CASES

<i>Am. Civil Liberties Union v. Reno</i> , 31 F. Supp. 2d 473, 476 (E.D. Pa. 1999); also aff'd, 217 F.3d 162 (3d Cir. 2000) vacated sub nom.	42
<i>Ashcroft v. Am. Civil Liberties Union</i> , 535 U.S. 564, 122 S. Ct. 1700, 152 L. Ed. 2d 771 (2002)	42
<i>Ashcroft v. American Civil Liberties Union</i> , 542 U.S. 656 (2004);	10
<i>Ashcroft v. Free Speech Coalition</i> , 535 U.S. 234 (2002)	10
<i>Baker v. Nelson</i> , 191 N.W.2d 185, 186 (Minn. 1971)	6
<i>Bishop v. Smith</i> , 760 F.3d 1070 (10th Cir. 2014)	2
<i>Bostic v. Schaefer</i> , 760 F.3d 352 (4th Cir. 2014)	2
<i>Bowen v. Gilliard</i> , 483 U.S. 587, 602 (1987)	28
<i>Brown v. Board of Education</i> , 347 U.S. 483 (1954)	28
<i>Brenner v. Scott</i> , 2014 WL 1652418 (2014)	29
<i>Carter v. WellesBowen Realty, Inc.</i> , 628 F.3d 790, 790 (6th Cir. 2010)	36
<i>Church of the Holy Trinity v. United States</i> , 143 U.S. 457 (1892)	20
<i>City of Cleburne v. Cleburne Living Center</i> , 473 U.S. 432, 440 (1985)	28
<i>Cleveland Bd. of Educ. v. LaFleur</i> , 414 U.S. 632 (1974)	29
<i>C.M. v. G.M.</i> , 238 F.3d 420 (6th Cir. 2000)	11
<i>Davis v. Prison Health Services</i> , 679 F.3d 433, 438 (6th Cir. 2012 )	38
<i>Equality Foundation of Greater Cincinnati, Inc. v. City of Cincinnati</i> , 128 F.3d 289, 29294 (6th Cir. 1997);	38
<i>Feller v. Brock</i> , 802 F.2d 722, 729 (4th Cir.1986)	37

<i>Ferguson v. Skrupa</i> , 372 U.S. 726 (1963).	39
.....	
<i>Frontiero v. Richardson</i> , 411 U.S. 677, 686 (1973)	28
.....	
<i>General Synod of The United Church of Christ v. Cooper</i> , 3:14-cv-213	7
.....	
<i>Ginsberg v. New York</i> , 390 U.S. 629, 639–40, 88 S.Ct. 1274, 20 L.Ed.2d 195 (1968)	42
.....	
<i>Golinski v. Office of Pers. Mgmt.</i> , 824 F. Supp. 2d 968, 314 33 (N.D. Cal. 2012)	24
.....	
<i>Griggs v. Duke Power Co.</i> , 401 U.S. 424, 431, 91 S.Ct. 849, 853, 28 L.Ed.2d 158 (1971)	23
.....	
<i>Griswold v. Connecticut</i> , 381 U.S. 479 (1965)	29
.....	
<i>Grubbs v. Norris</i> , 870 F.3d 343, 345 (6th Cir. 1998).	37
.....	
<i>Hernandez Montiel v. INS</i> , 225 F.3d 1084, 1093 (9th Cir. 2000)	24
.....	
<i>Hill v. Western Elec. Co., Inc.</i> , 672 F.2d 381, 38687 (4th Cir. 1982);	37
.....	
<i>In re Marriage Cases</i> , 183 P.3d 384, 442 (Cal. 2008)	32
.....	
<i>Kerrigan v. Comm’r of Pub. Health</i> , 957 A.2d 407, 438 (Conn. 2008)	32
.....	
<i>Kitchen v. Herbert</i> , 755 F.3d 1193 (10th Cir. 2014)	2
.....	
<i>Lawrence v. Texas</i> , 539 U.S. 558, 57677 (2003)	2, 24, 29, 32, 35
.....	
<i>Latta v. Otter</i> , No. 1435420, 2014 WL 4977682 (9th Cir. Oct. 7, 2014)	2
.....	
<i>Lochner v. New York</i> , 198 U.S. 45 (1905)	39
.....	
<i>Loving v. Virginia</i> , 388 U.S. 1 (1967)	2, 22
.....	
<i>Lyng v. Castillo</i> , 477 U.S. 635, 638 (1986)	28
.....	
<i>Marino v. Ortiz</i> , 484 U.S. 301, 304 (1988)	39
.....	
<i>Massachusetts v. United States Dep’t of Health &amp; Human Servs.</i> , 682 F.3d 1, 11 (1st Cir. 2012)	28
.....	

<i>Mass. Bd. of Ret. v. Murgia</i> , 427 U.S. 307, 313 (1976)	28
.....	
<i>McDonald v. Santa Fe Trail Transp. Co.</i> , 427 U.S. 273, 27879, 96 S. Ct. 2574, 2578, 49 L. Ed. 2d 493 (1976)	23
.....	
<i>Michigan State AFL CIO v. Miller</i> , 103 F.3d 1240, 1248 (6th Cir. 1997)	11
.....	
<i>M.L.B. v. S.L.J.</i> , 519 U.S. 102 (1996)	29
.....	
<i>New York v. Ferber</i> , 458 U.S. 747, at 754 (1982)	22
.....	
<i>Nguyen v. I.N.S.</i> , 533 U.S. 53, 73 (2001)	41
.....	
<i>Okl. v. Ozarks Rural Elec. Coop. Corp.</i> , 79 F.3d 1038 (10th Cir. 1996)	11
.....	
<i>Paris Adult Theatre Iv. Slaton</i> , 413 US 49, at 63,69 (1973)	23
.....	
<i>Patterson v. Shumate</i> , 912 F.2d 463 (4th Cir. 1990)	37
.....	
<i>Pedersen v. Office of Pers. Mgmt.</i> , 881 F. Supp. 2d 294, 3 18-19 (D. Conn. 2012)	24
.....	
<i>Perry v. Schwarzenegger</i> , 704 F. Supp. 2d 921, 966 (N.D. Cal. 2010)	27
.....	
<i>Planned Parenthood of S.E. Pa. v. Casey</i> , 505 U.S. 833, 848 (1992)	29
.....	
<i>Plyler v. Doe</i> , 457 U.S. 202, 216 n.14 (1985)	28
.....	
<i>Roe v. Wade</i> , 410 U.S. 113 (1973)	35
.....	
<i>Romer v. Evan</i> , 517 U.S. 620, 116 S. Ct. 1620, 134 L. Ed. 855 (1996)	11
.....	
<i>Roth v. United States</i> , 354 U.S. 476, at 485 n. 15 (1957)	22
.....	
<i>Saenz v. Roe</i> , 526 U.S. 489, 498, 499 (1999)	25
.....	
<i>Scarborough v. Morgan County Bd. of Educ.</i> , 470 F.3d 250, 261 (6th Cir. 2006)	38
.....	
<i>.S.E. Pa. v. Casey</i> , 505 U.S. 833, 848 (1992)	29
.....	
<i>Sevier v. Apple, Inc.</i> , No. 3-13-0607, 2014 WL 4699508 (M.D. Tenn. Sept. 19, 2014)	9
.....	
<i>Sevier v. Cuomo et al</i> , 14-cv-5380	

.....	14, 15, 18, 34, 43
<i>Sevier v. Google et. al</i> 3:14-cv-1313 (M.D. Tenn. July. 2014)	.....42
<i>Shelby Cnty. v. Holder</i> , 133 S. Ct. 2612, 2623 (2013)	.....39
<i>United States of America et al v. State of Michigan</i> , 424 Fd.3d. 438, 43, (6th Cir. 2005)	.....37
<i>United States v. Virginia</i> , 518 U.S. 515, 557 (1996)	.....11, 28
<i>United States v. Windsor</i> , 133 S. Ct. 2675, 186 L. Ed. 2d 808 (2013)	.....2, 33, 34, 38
<i>Washington v. Glucksberg</i> , 521 U.S. 702 (1997)	.....40
<i>Watkins v. US. Army</i> , 875 F.2d 699, 725 (9th Cir. 1989)	.....24
<i>Windsor v. United States</i> , 699 F.3d 169 (2d Cir. 2012)	.....14, 16, 28, 31, 32, 41
<i>Zablocki v. Redhail</i> , 434 U.S. 374 (1978)	.....2, 29

**STATUTES**

Supreme Court Rule 21	.....1
F.R.C.P. 24(a), and 24(b)	.....1, 25, 36
T. C. A. § 36-6-106	.....1
Civil Rights Act of 1964, Pub. L. No. 88352, 78 Stat. 241.pag 37	.....3
42 U.S.C. s 2000e-2(a)(1)	.....23, 26
Tenn. Const. art. XI, § 18; Tenn. Code Ann. §§ 36-3-101 to 505	.....6, 33
Title VII 110 Cong.Rec. 2578 (1964) (remarks of Rep. Celler)	.....23
28 U.S.C. § 453	.....24
18 U.S. Code § 1460	.....30
F.R.C.P. 72	

.....30  
Fed. R. Evid. 501

.....42

**APPENDIX**

APP A- Decision from the 6th Circuit in Tanco 14-1341

APP B - Emails Opposing My Request To Intervene By Hypocritical Same-Sex Litigants

APP C - Motion To Consolidate Tanco with Apple Case in District Court

APP D - Order Denying Motion to Intervene And Motion To Intervene in District Court In Tanco

APP E - Order Denying Motion To Intervene In The 6th Circuit For Untimeliness And Motion To Intervene In The 6th

APP F - Sevier V. Cuomo

APP G - Complaint In Apple 3:13-cv-0607

APP H- Fight The New Drug Testimonials

APP I - Marriage Will Be Rule Unconstitutional In California

APP J - Homosexuality Cultivates Mental Illness

APP K - There Is No Gay Gene

APP L - Tim Cook from Apple Is Pushing Pornography And Homosexuality

APP M - Apple Litigation Provoked Responsiveness Of The British Prime Minister

APP N - Gay Agenda In Hollywood Has Been Around For Years

APP O - Motion To Intervene In North Carolina, Order Denying Motion To Intervene, Motion For Reconsideration

APP P - Motion To Intervene In Utah

APP Q - Order From Florida District Court Denying Intervention, Motion For Reconsideration

APP R - Order Denying Motion to Intervene In Virginia

APP S - Order From the District Court In Arizona.

APP T- Media Supports The Science Behind My Claim To Intervene

APP U-Order Denying Intervention At The District Court Level And Motion to Intervene In The 6th Regarding The State Of Kentucky