

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

The Wilderness Society, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	Case No. 1-17-cv-02587 (TSC)
	)	
v.	)	
	)	
Donald J. Trump, <i>et al.</i> ,	)	
	)	
Defendants,	)	
_____	)	
	)	
Grand Staircase-Escalante Partners, <i>et al.</i> ,	)	Case No. 1:17-cv-02591 (TSC)
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
Donald J. Trump, <i>et al.</i> ,	)	
	)	
Defendants	)	<b>Consolidated Cases</b>
_____	)	
	)	
Garfield County and Kane County, Utah,	)	
	)	
Applicant Defendant-Intervenors.	)	

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**DEFENDANT-INTERVENORS’ MOTION TO INTERVENE**

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Pursuant to Federal Rule of Civil Procedure 24(a), Kane County and Garfield County, Utah move to intervene as of right. In the alternative, should the Court decide against granting intervention as of right, Intervenors move for permissive intervention pursuant to Federal Rule of Civil Procedure 24(b).

This motion is accompanied by a supporting memorandum of law, declarations in support

of each applicant-intervenor's motion to intervene, and a [Proposed] Order granting Defendant-Intervenors' Motion to Intervene. Also, contemporaneously with this Motion to Intervene, Defendant-Intervenors submit [Proposed] Answers, pursuant to Federal Rule of Civil Procedure 24.

Prior to filing this Motion to Intervene, counsel for Defendant-Intervenors contacted Plaintiffs' counsel and Defendants' counsel to request their position, pursuant to Local Civil Rule 7(m). Counsel for Plaintiffs stated that Plaintiffs would take no position until they had an opportunity to review the Motion papers. Counsel for Federal Defendants were contacted on April 23, 2018, and again on April 30, 2018. Counsel for Defendants stated on April 30, 2018 that Defendants were still considering their position on the Motion.

DATED: April 30, 2018.

Respectfully submitted:

/s/ William Perry Pendley  
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**CERTIFICATE OF SERVICE**

I hereby certify that on April 30th, 2018, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

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/s/ William Perry Pendley  
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