

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CENTER FOR BIOLOGICAL DIVERSITY; and)
SIERRA CLUB,)

Plaintiffs,)

v.)

DAVID BERNHARDT, in his official capacity as)
Secretary of the United States Department of the)
Interior; AURELIA SKIPWITH, in her official)
capacity as Director of the United States Fish and)
Wildlife Service; UNITED STATES FISH AND)
WILDLIFE SERVICE; and UNITED STATES)
FOREST SERVICE,)

Defendants,)

and)

UPPER GREEN RIVER CATTLE)
ASSOCIATION; SOMMERS RANCH, LLC;)
PRICE CATTLE RANCH; MURDOCK LAND)
AND LIVESTOCK CO.; and WYOMING STOCK)
GROWERS ASSOCIATION,)

Applicants in Intervention.)

No. 1:20-cv-00855-APM

**MOTION TO INTERVENE BY
UPPER GREEN RIVER CATTLE
ASSOCIATION; SOMMERS
RANCH, LLC; PRICE CATTLE
RANCH; MURDOCK LAND AND
LIVESTOCK CO.; AND
WYOMING STOCK GROWERS
ASSOCIATION**

Pursuant to Fed. R. Civ. P. 24(a), the Upper Green River Cattle Association; Sommers Ranch, LLC; Price Cattle Ranch; Murdock Land & Livestock Co.; and the Wyoming Stock Growers Association (collectively “Ranchers”) move to intervene as of right in the above-captioned case as Intervenor-Defendants. Alternatively, Ranchers move for permissive intervention pursuant to Fed. R. Civ. P. 24(b). This Motion is accompanied by a supporting Memorandum of Points and Authorities, declarations in support of each applicant-intervenor’s motion to intervene, and a Proposed Order granting Ranchers’ Motion to Intervene. Also,

contemporaneously with this Motion to Intervene, Ranchers submit their Proposed Answer to Plaintiffs' Complaint, pursuant to Fed. R. Civ. P. 24.

Prior to filing this Motion, counsel for Ranchers 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 Defendants stated that Defendants took no position on the Motion.

DATED: July 13, 2020.

Respectfully submitted by:

MOUNTAIN STATES LEGAL FOUNDATION

/s/ Brian E. Gregg

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Attorneys for Applicants in Intervention

CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2020, I electronically transmitted the attached document to the Clerk's office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to all parties or counsel of record, as more fully reflected on the Notice of Electronic Filing.

s/ Brian E. Gregg