

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA**

ATCHAFALAYA BASINKEEPER, *et al.*,

Plaintiffs,

v.

DAVID BERNHARDT, Secretary of the
Interior, *et al.*,

Defendants,

and

SAFARI CLUB INTERNATIONAL,

Proposed Defendant-Intervenor.

Civ. No. 20-cv-00651-BAJ-EWD

MOTION TO INTERVENE OF SAFARI CLUB INTERNATIONAL

Safari Club International (“Safari Club”), by and through its counsel, moves to intervene as a defendant as of right in this action pursuant to Fed. R. Civ. P. 24(a)(2). If this Court determines that Safari Club does not fulfill the criteria for intervention as of right, Safari Club then seeks leave to intervene permissively pursuant to Fed. R. Civ. P. 24(b)(1)(B). As a final alternative, Safari Club seeks to participate as an amicus curiae in support of David Bernhardt, *et al.* (“Federal Defendants”). This motion is supported by the accompanying memorandum in support, accompanying declarations, and other documents on file in this case. Safari Club also lodges with this motion a proposed order and a proposed answer to be filed if the Court grants intervention.

Pursuant to Local Rule 7(e), counsel for Safari Club contacted counsel for all the parties to this matter to ascertain their clients’ positions on this motion. Federal Defendants state that they

will take no position on this motion to intervene. Plaintiffs Atchafalaya Basinkeeper, *et al.* state that they have not yet formulated a position on Safari Club's motion.¹

For the reasons described in the accompanying memorandum in support and other supporting documents, Safari Club respectfully requests that the Court grant its motion to intervene in this litigation.

Dated: November 17, 2020.

Respectfully Submitted,

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* Motion for admission as visiting attorney granted.

¹ Counsel for Safari Club contacted Plaintiffs' counsel on October 23, 2020 to inquire as to Plaintiffs' position, and both corresponded multiple times over the course of two weeks, but Plaintiffs have not yet formulated a position on the motion.