

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ENVIRONMENTAL INTEGRITY)	
PROJECT, <i>et al.</i> ,)	
<i>Plaintiffs,</i>)	
)	
v.)	Civil Action No. 1:20-cv-1734 (KBJ)
)	
ANDREW R. WHEELER, <i>et al.</i> ,)	
<i>Defendants,</i>)	
)	
&)	
)	
AMERICAN FARM BUREAU FEDERATION,)	
<i>et al.</i> ,)	
)	
<i>Proposed Intervenors-</i>)	
<i>Defendants.</i>)	

MOTION TO INTERVENE
OF PROPOSED BUSINESS INTERVENORS

Pursuant to Federal Rule of Civil Procedure 24(a), and for the reasons stated in the attached memorandum of points and authorities, the American Farm Bureau Federation; American Petroleum Institute; American Road and Transportation Builders Association; Chamber of Commerce of the United States of America; Edison Electric Institute; Leading Builders of America; National Alliance of Forest Owners; National Association of Home Builders; National Cattlemen’s Beef Association; National Corn Growers Association; National Mining Association; National Pork Producers Council; National Stone, Sand, and Gravel Association; Public Lands Council; and U.S. Poultry & Egg Association (collectively, the “proposed Business Intervenors”) respectfully move the Court for an order permitting them to intervene as-of right in the above-captioned matter as defendants. Alternatively, the proposed

Business Interventions move for permissive intervention pursuant to Federal Rule of Civil Procedure 24(b).

The proposed Business Intervenor concurrently submit their proposed Answer in Intervention, the Declaration of Don Parrish (“Parrish Dec.”), and a Proposed Order. Pursuant to Local Civil Rule 7(m), the proposed Business Intervenor have conferred with counsel for Defendants and counsel for Plaintiffs regarding the proposed Business Intervenor’s motion to intervene in this matter. The Federal Defendants do not oppose intervention, but take no position on whether intervention is appropriate as of right or permissively. Plaintiffs state that they oppose intervention and seek an additional seven days to do so, as to which extension request Plaintiffs and the proposed Business Intervenor have conferred and Intervenor have no objection.

Respectfully submitted,

Dated this 14th day of July, 2020.

/s/ Adam C. Sloane

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*Attorneys for proposed Business-Intervenor
Defendants*

* *pro hac vice pending*

** *admission application pending*

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of July, 2020, I caused a true and correct copy of the Motion to Intervene of Proposed Business Intervenors; Memorandum of Law in Support; Proposed Answer; Declaration of Don Parrish; and Proposed Order to be served upon all counsel of record registered with the Court's ECF system.

Dated this 14th day of July, 2020.

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