

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ENVIRONMENTAL JUSTICE  
HEALTH ALLIANCE, et al.,

*Plaintiffs,*

v.

COUNCIL ON ENVIRONMENTAL  
QUALITY and MARY NEUMAYR, in  
her official capacity as Chairman of the  
Council on Environmental Quality,

*Defendants.*

Civil Action No. 1:20-cv-06143

Hon. Colleen McMahon

**PROPOSED INTERVENORS' NOTICE OF MOTION TO INTERVENE AS  
DEFENDANTS**

Please take notice that, upon the accompanying Memorandum of Law, dated September 25, 2020, and the exhibits attached thereto, Proposed Intervenors American Farm Bureau Federation, American Forest Resource Council, American Fuel & Petrochemical Manufacturers, American Petroleum Institute, American Road & Transportation Builders Association, Chamber of Commerce of the United States of America, Federal Forest Resource Council, Interstate Natural Gas Association of America, Laborers' International Union of North America, and National Cattlemen's Beef Association will move this Court before The Honorable Colleen McMahon, at the Daniel Patrick Moynihan United States Courthouse for the Southern District of New York, 500 Pearl Street, Courtroom 24A, New York, New York 10007, at a time and date to be set by the Court, for an Order permitting Proposed Intervenors to intervene as defendants in this action pursuant to Federal Rule of Civil Procedure 24. Please take further notice that the parties shall serve opposing papers, if any, no later than October 9, 2020, and Proposed Intervenors shall serve reply papers, if any, no later than October 16, 2020.

Dated: September 25, 2020

Respectfully submitted,

/s/ Andrew B. Kratenstein

Andrew B. Kratenstein  
McDermott Will & Emery LLP  
340 Madison Avenue  
New York, NY 10173  
(212) 547-5695

Michael B. Kimberly\*  
Matthew A. Waring\*  
McDermott Will & Emery LLP  
500 North Capitol Street, NW  
Washington, D.C. 20001  
(202) 756-8000

*\*pro hac vice* motions forthcoming

*Counsel for Proposed Intervenor*s