

Sarah H. Burt (CA Bar # 250378) (Motion for admission *Pro Hac Vice* pending)
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Attorneys for Proposed Intervenor-Defendants

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

STATE OF ALASKA,)
)
 Plaintiff,)
)
 v.) Case No. 3:12-cv-00142-SLG
)
 HILLARY RODHAM CLINTON, *et al.*,)
)
 Defendants.)
)
 _____)

MOTION TO INTERVENE (Fed. R. Civ. P. 24)

Pursuant to Federal Rule of Civil Procedure 24(a)(2), Center for Biological Diversity, Environmental Defense Fund, Friends of the Earth, and Natural Resources Defense Council (collectively, "Proposed Intervenor-Defendants") respectfully move to intervene as of right as defendants in the above-captioned action. In the alternative, Proposed Intervenor-Defendants request leave to intervene by permission pursuant to Federal Rule of Civil Procedure 24(b). This

MOTION TO INTERVENE
State of Alaska v. Clinton
Case No. 3:12-cv-00142-SLG

motion is based on the Memorandum in Support of Motion to Intervene, and the Declarations of Rebecca Noblin, Erich Pica, Frederic Felleman, David Pettit, Elena Craft, John Stith, and James Fine, submitted herewith. Pursuant to D.AK L.R. 7.4(b) and Fed. R. Civ. P. 24(c), Proposed Intervenor-Defendants lodge with this motion a Proposed Order and Proposed Intervenor-Defendants' Answer.

Counsel for federal Defendants Hilary Rodham Clinton, *et al.* has advised undersigned counsel for Proposed Intervenor-Defendants that federal Defendants take no position on this motion. Counsel for Plaintiff State of Alaska has advised undersigned counsel for Proposed Intervenor-Defendants that Plaintiff State of Alaska takes no position on this motion prior to Plaintiff's counsel's review of the documents submitted herewith.

Respectfully submitted this 27th day of September, 2012.

s/ Sarah H. Burt

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CERTIFICATE OF SERVICE

I hereby certify that on September 27, 2012, a copy of the foregoing MOTION TO INTERVENE, with accompanying attachments, was served electronically on Seth M. Beausang and Mark A. Nitzynski.

Respectfully submitted this 27th day of September, 2012.

s/ Sarah H. Burt

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