

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

TAYLOR ENERGY COMPANY LLC,)	CIVIL ACTION
)	
Plaintiff,)	No.: 18-14046 c/w
)	18-14051
v.)	
)	Refers to: 18-14046
CAPTAIN KRISTI M. LUTTRELL, et al.,)	
)	Section: B(5)
Defendants,)	
)	Judge: Hon. Ivan L. R. Lemelle
HEALTHY GULF,)	
)	Magistrate: Hon. Michael North
Applicant-Intervenor-Defendant.)	
_____)	

APPLICANT-INTERVENOR-DEFENDANT’S MOTION TO INTERVENE

Pursuant to Federal Rule of Civil Procedure 24(a), Applicant-Intervenor Defendant Healthy Gulf respectfully moves this Court for leave to intervene as of right in civil action number 18-14046, *Taylor Energy Company LLC v. Captain Kristi M. Luttrell and United States ex rel. U.S. Coast Guard*, for the reasons set forth in the accompanying memorandum. In the alternative, Healthy Gulf moves for permissive intervention under Federal Rule of Civil Procedure 24(b).

Pursuant to LR 7.6, counsel for Healthy Gulf has attempted to obtain consent for the filing and granting of this Motion from all parties having an interest to oppose, through their counsel. Counsel for Defendants Captain Kristi Luttrell and the United States, and counsel for Defendant Couvillion Group, LLC indicated they will take no position until they have reviewed

the filings. Counsel for Taylor Energy does not consent to the motion. Pursuant to Federal Rule of Civil Procedure 24(c), Healthy Gulf lodges its proposed answer (Exhibit A) with this motion.

Respectfully submitted this 15th day of March, 2019.

EARTHJUSTICE

s/ Michael L. Brown

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