



contrary to law, the Court should find the suspension invalid and set aside the challenged government action.

This Court has federal-question jurisdiction under 28 U.S.C. § 1331. Respondent President Biden is an officer of the United States; Respondent de la Vega is an officer of the United States; the Bureau of Land Management is an entity of the United States Government. The United States has waived its sovereign immunity under the APA, 5 U.S.C. § 702.

Submitted respectfully this 27th day of January, 2021,

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