

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

_____	)	
Conservation Law Foundation, Inc.,	)	
	)	C.A. No. 1:17-cv-00396-WES-LDA
Plaintiff,	)	
	)	
v.	)	
	)	
Shell Oil Products US,	)	
Shell Oil Company,	)	
Shell Petroleum, Inc.,	)	
Shell Trading (US) Company, and	)	
Motiva Enterprises LLC,	)	
	)	
Defendants.	)	
_____	)	

**CONSERVATION LAW FOUNDATION’S OBJECTION TO DEFENDANTS’ MOTION  
TO DISMISS THE AMENDED COMPLAINT**

Plaintiff Conservation Law Foundation, Inc. (“CLF”) respectfully requests that this Honorable Court deny Defendants’ Motion to Dismiss the Amended Complaint (Doc. 20). As grounds, CLF incorporates the attached Memorandum of Law.

WHEREFORE, CLF respectfully requests that the Court deny Defendants’ Motion in its entirety.

Respectfully submitted,

Dated: February 12, 2018

CONSERVATION LAW FOUNDATION, INC.

By its attorneys:

/s/ Jerry Elmer

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 12, 2018, the foregoing Objection to Defendants' Motion to Dismiss the Amended Complaint was filed through the Court's electronic filing system ("ECF"), by which means the document is available for viewing and downloading from the ECF system and a copy of the filing will be sent electronically to all parties registered with the ECF system.

/s/ Heather A. Murray  
Heather A. Murray