

JAMES A. PATTEN
PATTEN, PETERMAN,
BEKKEDAHN & GREEN,
PLLC
Suite 300, The Fratt Building
2817 Second Avenue North
Billings, MT 59101-2041
Telephone: (406) 252-8500
Facsimile: (406) 294-9500
email: apatten@ppbglaw.com

STEPHAN C. VOLKER (Pro hac vice)
ALEXIS E. KRIEG (Pro hac vice)
STEPHANIE L. CLARKE (Pro hac vice)
JAMEY M.B. VOLKER (Pro hac vice)
LAW OFFICES OF STEPHAN C. VOLKER
1633 University Avenue
Berkeley, California 94703-1424
Telephone: (510) 496-0600
Facsimile: (510) 845-1255
email: svolker@volkerlaw.com
akrieg@volkerlaw.com
sclarke@volkerlaw.com
jvolker@volkerlaw.com

Attorneys for Plaintiffs
INDIGENOUS ENVIRONMENTAL NETWORK
and NORTH COAST RIVERS ALLIANCE

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION

INDIGENOUS ENVIRONMENTAL
NETWORK and NORTH COAST RIVERS)
ALLIANCE,)

Plaintiffs,

vs.

PRESIDENT DONALD J. TRUMP,
UNITED STATES DEPARTMENT OF)
STATE; MICHAEL R. POMPEO, in his)
official capacity as U.S. Secretary of State;)
UNITED STATES ARMY CORPS OF)
ENGINEERS; LT. GENERAL TODD T.)
SEMONITE, Commanding General and)
Chief of Engineers; UNITED STATES)
FISH AND WILDLIFE SERVICE, a federal)
agency; MARGARET EVERSON, in her)

Civ. No. CV 19-28-GF-BMM
**ERRATUM TO PLAINTIFFS’
MEMORANDUM OF POINTS
AND AUTHORITIES IN
OPPOSITION TO FEDERAL
DEFENDANTS’ MOTION TO
DISMISS AND
TRANSCANADA’S MOTION
TO DISMISS**
Judge: Hon. Brian M. Morris
Case Filed: April 5, 2019

official capacity as Acting Director of the)
 U.S. Fish and Wildlife Service; UNITED)
 STATES BUREAU OF LAND)
 MANAGEMENT, and DAVID)
 BERNHARDT, in his official capacity as)
 U.S. Secretary of the Interior,)
)
 Defendants,)
)
 TRANSCANADA KEYSTONE PIPELINE,)
 LP, a Delaware limited partnership, and TC)
 ENERGY CORPORATION, a Canadian)
 Public Company,)
)
 Defendant-Intervenors.)
 _____)

To the above Court and all counsel:

Please take notice that on page 35, line 20 of Plaintiffs’ Memorandum of Points and Authorities in Opposition to Federal Defendants’ Motion to Dismiss and TransCanada’s Motion to Dismiss filed August 22, 2019 (ECF 57) the word “Trump” should read “Bush,” so that the sentence reads “Here, President Bush chose not to.”

Plaintiffs’ counsel apologize for this inadvertent error.

Dated: October 30, 2019

PATTEN, PETERMAN, BEKKEDAHL &
GREEN, PLLC

s/ James A. Patten
JAMES A. PATTEN

LAW OFFICES OF STEPHAN C. VOLKER

s/ *Stephan C. Volker*
STEPHAN C. VOLKER (Pro Hac Vice)

Attorneys for Plaintiffs
INDIGENOUS ENVIRONMENTAL NETWORK
and NORTH COAST RIVERS ALLIANCE

CERTIFICATE OF SERVICE

I, Stephan C. Volker, am a citizen of the United States. I am over the age of 18 years and not a party to this action. My business address is the Law Offices of Stephan C. Volker, 1633 University Avenue, Berkeley, California 94703.

On October 30, 2019 I served the following documents by electronic filing with the Clerk of the Court using the CM/ECF system, which sends notification of such filing to the email addresses registered in the above entitled action:

**ERRATUM TO PLAINTIFFS' MEMORANDUM OF POINTS AND
AUTHORITIES IN OPPOSITION TO FEDERAL DEFENDANTS'
MOTION TO DISMISS AND TRANSCANADA'S MOTION TO DISMISS**

I declare under penalty of perjury that the foregoing is true and correct.

s/ Stephan C. Volker
STEPHAN C. VOLKER (Pro Hac Vice)