

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

STATE OF CALIFORNIA, et al.,

Plaintiffs,

v.

ELAINE L. CHAO, et al.,

Defendants,

and

THE COALITION FOR SUSTAINABLE
AUTOMOTIVE REGULATION and THE
ASSOCIATION OF GLOBAL
AUTOMAKERS, INC.,

Movant-Intervenors.

No: 1:19-cv-2826-KBJ

ENVIRONMENTAL DEFENSE FUND, et al.,

Plaintiffs,

v.

ELAINE L. CHAO, et al.,

Defendants,

and

THE COALITION FOR SUSTAINABLE
AUTOMOTIVE REGULATION and THE
ASSOCIATION OF GLOBAL
AUTOMAKERS, INC.,

Movant-Intervenors.

No: 1:19-cv-2907-KBJ

**[PROPOSED] JOINDER OF THE COALITION FOR SUSTAINABLE AUTOMOTIVE
REGULATION AND THE ASSOCIATION OF GLOBAL AUTOMAKERS
IN DEFENDANTS' MOTION TO DISMISS OR TRANSFER**

The Coalition for Sustainable Automotive Regulation and the Association of Global Automakers (collectively, "Movant-Intervenors") have moved to intervene in the above-captioned proceedings pursuant to Federal Rule of Civil Procedure 24 and Local Rule 7(j). Consistent with the obligations under those rules to file concurrently with a motion to intervene a "pleading that sets out the claim or defense for which intervention is sought," Fed. R. Civ. P. 24(c), Movant-Intervenors hereby join Defendants' Motion to Dismiss or Transfer, served on Plaintiffs on October 15, 2019. *See* Dkt. Nos. 26, 27. For the reasons set forth in Defendants' Motion and memorandum in support thereof, Movant-Intervenors move to dismiss these cases pursuant to Federal Rule of Civil Procedure 12(b)(1) or, in the alternative, move to transfer them to the United States Court of Appeals for the D.C. Circuit pursuant to 28 U.S.C. § 1631.

Respectfully submitted,

Dated: October 31, 2019

/s/ Raymond B. Ludwiszewski

RAYMOND B. LUDWISZEWSKI
Bar No. 420540
RACHEL LEVICK CORLEY
Bar No. 1024969
GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Avenue, NW
Washington, DC 20036
(202) 955-8500
Fax: (202) 467-0539

*Attorneys for the Coalition for Sustainable
Automotive Regulation and the Association of
Global Automakers, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2019, I served via email a copy of the foregoing [Proposed] Joinder in Defendants' Motion to Dismiss or Transfer on Plaintiffs and Defendants in the above-captioned proceedings.

/s/ Raymond B. Ludwiszewski

RAYMOND B. LUDWISZEWSKI
Bar No. 420540
GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Ave. NW
Washington, D.C. 20036
(202) 955-8500
Fax: (202) 467-0539
RLudwiszewski@gibsondunn.com