

STATE OF MINNESOTA  
IN COURT OF APPEALS



**CASE TITLE:**

In the Matter of the Application of Enbridge Energy, Limited Partnership, for a Certificate of Need and a Routing Permit for the Line 3 Replacement Project in Minnesota from the North Dakota Border to the Wisconsin Border

**MOTION OF RELATOR  
FRIENDS OF THE HEADWATERS  
FOR A STAY OF CONSTRUCTION  
PENDING APPEAL**

Friends of the Headwaters,

**APPELLATE COURT CASE  
NUMBER: A20-1071**

Petitioner,

vs.

Minnesota Public Utilities Commission,

Respondent

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**TO: MINNESOTA COURT OF APPEALS**

Pursuant to Minn. R. Civ. App. P. 108.02, subd. 6, and 127, relator Friends of the Headwaters (FOH) moves this Court for an Order staying construction of Enbridge Energy's Line 3 project pending the outcome of this appeal, and reversing the December 9, 2020 Order of Respondent PUC denying the same motion filed by relators White Earth Band of Ojibwe and Red Lake Band of Chippewa Indians.

This motion is based on the enclosed Memorandum and all the files and proceedings herein.

Date: Dec. 30, 2020

s/ Scott Strand

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