

Andrew C. Lillie
Jessica Black Livingston
HOGAN LOVELLS US LLP
*Attorneys for Defendant–Intervenor
Anschutz Exploration Corp.*

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

WILDEARTH GUARDIANS et al.,

Plaintiffs,

vs.

DEB HAALAND et al.,

Defendants.

Case No. 1:21-cv-00175-RC

**ANSCHUTZ EXPLORATION
CORPORATION’S
MEMORANDUM OF
POINTS AND
AUTHORITIES IN
OPPOSITION TO
PLAINTIFFS’ MOTION TO
STAY**

Plaintiffs WildEarth Guardians and Physicians for Social Responsibility have asked the Court to stay all deadlines and proceedings in this case for 60 days. Pls.’ Mot. at 1, ECF No. 46. They state that they have reached an agreement in principle with Federal Defendants to settle and dismiss the case. *Id.* Plaintiffs thus seek this stay so that they can work toward finalizing that settlement agreement with Federal Defendants. *Id.*

Defendant–Intervenor Anschutz Exploration Corporation opposes Plaintiffs’ motion. Plaintiffs argue that “[t]he interests of the other Intervenor-Defendants,” such as AEC, “would be similarly served by a final resolution of this case, the ultimate result intended by this stay request.” *Id.* at 3. But AEC has no idea whether the potential settlement between Plaintiffs and Federal Defendants would serve AEC’s interests. That is so for one simple reason: neither Plaintiffs nor Federal Defendants have involved AEC in any of their settlement discussions. As a result, AEC has no information about or insight into the terms of the proposed settlement. AEC

thus opposes Plaintiffs' request to stay this case so that they can work toward finalizing a settlement agreement with Federal Defendants—a settlement agreement that AEC knows precious little about.

If, however, the Court were to grant Plaintiffs' motion, it should do so on the condition that Plaintiffs and Federal Defendants involve AEC in all future settlement discussions and communications. The Court should not permit Plaintiffs and Federal Defendants to resolve litigation over the validity of lease sales and oil-and-gas leases—including AEC's leases—without AEC being at the table.

Respectfully submitted,

/s/ Andrew C. Lillie

Andrew C. Lillie

Jessica Black Livingston

HOGAN LOVELLS US LLP

1601 Wewatta Street, Suite 900

Denver, CO 80202

andrew.lillie@hoganlovells.com

jessica.livingston@hoganlovells.com

Phone: (303) 899-7300

Facsimile: (303) 899-7333

Attorneys for Defendant–Intervenor

Anschutz Exploration Corporation

CERTIFICATE OF SERVICE

I certify that on August 12, 2021, I filed this document using the Court's electronic case-filing system, which will serve the document on all counsel of record.

/s/ Andrew C. Lillie

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