

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

_____	)	
FRIENDS OF THE EARTH, et al.	)	
	)	No. 1:21-cv-02317-RDM
Plaintiff,	)	
	)	Judge Randolph D. Moss
vs.	)	
	)	
DEBRA A. HAALAND, et al.	)	
	)	
Defendants,	)	
	)	
and	)	
	)	
STATE OF LOUISIANA,	)	
	)	
Defendant-Intervenor.	)	
_____	)	

**DEFENDANTS’ RESPONSE TO AMERICAN PETROLEUM INSTITUTE’S  
MOTION FOR LEAVE TO INTERVENE**

Defendants hereby respond to the American Petroleum Institute’s (“API”) motion for leave to intervene, ECF No. 31. Defendants do not oppose intervention in light of the Court’s prior order on the State of Louisiana’s motion to intervene, ECF No. 24.

Respectfully submitted this 20th day of October, 2021,

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Counsel for Defendants

**CERTIFICATE OF SERVICE**

I hereby certify that on this 20th day of October, 2021, I filed the above pleading with the Court's CM/ECF system, which provided notice of this filing by e-mail to all counsel of record.

*/s/ Luther L. Hajek*  
Luther L. Hajek