

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

Conservation Law Foundation, Inc.,

Plaintiff,

v.

No. 1:17-cv-00396-WES-LDA

Equilon Enterprises LLC d/b/a Shell Oil  
Products US,  
Shell Oil Company,  
Shell Petroleum, Inc.,  
Shell Trading (US) Company,  
Motiva Enterprises LLC, and  
Triton Terminaling LLC,

Defendants.

**MOTION FOR JUDGMENT ON THE PLEADINGS BY DEFENDANTS SHELL OIL  
COMPANY, SHELL PETROLEUM INC., AND SHELL TRADING (US) COMPANY**

Pursuant to Federal Rule of Civil Procedure 12(c), Defendants Shell Oil Company, Shell Petroleum, Inc., and Shell Trading (US) Company (“Non-Owner/Operator Defendants”) hereby move the Court to dismiss the entirety of Plaintiff Conservation Law Foundation, Inc.’s Third Amended Complaint, ECF No. 45, with prejudice. Should the Court grant this Motion, only Equilon Enterprises LLC d/b/a/ Shell Oil Products US, Motiva Enterprises LLC, and Triton Terminaling LLC would remain in this case.

Pursuant to LR Cv 7(a)(2), the grounds for this motion and supporting legal arguments are set forth in the Non-Owner/Operator Defendants’ attached Memorandum of Law.

Dated: February 11, 2022

Respectfully submitted,

/s/ Bina Reddy

Robert D. Fine (RI Bar # 2447)  
Chace, Rutenberg & Freedman, LLP  
One Park Row, Suite 300  
Providence, RI 02903  
(401) 453-6400  
Fax (401) 453-6411  
rfine@crflp.com

John S. Guttman (admitted *pro hac vice*)  
Beveridge & Diamond, P.C.  
1900 N Street, NW, Suite 100  
Washington, DC 20036  
(202) 789-6020  
Fax (202) 789-6190  
jguttman@bdlaw.com

Bina Reddy (admitted *pro hac vice*)  
Beveridge & Diamond, P.C.  
400 W. 15th Street, Suite 1410  
Austin, Texas 78701  
(512) 391-8045  
Fax (512) 391-8099  
breddy@bdlaw.com

**CERTIFICATE OF SERVICE**

I hereby certify that on February 11, 2022, the foregoing Motion for Judgment on the Pleadings by Defendants Shell Oil Company, Shell Petroleum Inc., and Shell Trading (US) Company was filed through the Court's electronic filing system ("ECF"), by which means the document is available for viewing and downloading from the ECF system and a copy of the filing will be sent electronically to all parties registered with the ECF system.

/s/ Bina Reddy\_\_\_\_\_

Bina R. Reddy