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Case No. 4:17-cv-30-BMM*

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**[Additional Counsel in Signature Block]**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
GREAT FALLS DIVISION**

CITIZENS FOR CLEAN ENERGY, et al.,  
Plaintiffs,  
  
and  
  
THE NORTHERN CHEYENNE TRIBE,  
Plaintiff,

Case No. 4:17-cv-30-BMM

**PLAINTIFFS' JOINT  
MOTION FOR LEAVE TO  
SUPPLEMENT THEIR  
COMPLAINTS; FED. R.  
CIV. P. 15(d)**

v.

U.S. DEPARTMENT OF THE INTERIOR, et al.,

Defendants,

and

STATE OF WYOMING, et al.,

Defendant-Intervenors.

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STATE OF CALIFORNIA, et al.,

Plaintiffs,

v.

U.S. DEPARTMENT OF THE INTERIOR, et al.,

Defendants,

and

STATE OF WYOMING, et al.,

Defendant-Intervenors.

Case No. 4:17-cv-42-BMM  
(consolidated case)

Pursuant to Federal Rule of Civil Procedure 15(d), Plaintiffs in Case Nos. 4:17-cv-030-BMM (“Tribe and Conservation Plaintiffs”) and 4:17-cv-042-BMM (“State Plaintiffs”) respectfully request leave to supplement their respective complaints to allege new facts and claims related to Federal Defendants’ issuance on February 25, 2020 of an environmental assessment and finding of no significant impact regarding their March 29, 2017 decision to rescind the federal coal-leasing moratorium (“the Zinke Order”). This motion seeks to promote a complete

adjudication of the dispute between the parties in the interests of fairness and judicial economy, as set forth in the accompanying brief. Additionally, the Tribe and Conservation Plaintiffs and State Plaintiffs each submit their proposed First Supplemental Complaint, attached respectively hereto as Exhibits 1 and 2.

Plaintiffs' counsel conferred with counsel for Federal Defendants and each of the Defendant-Intervenors in this action. All counsel represented that they take no position on this motion at this time.

Respectfully submitted this 20th day of July, 2020.

/s/ Jenny K. Harbine

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served today via the Court's CM/ECF system on all counsel of record.

/s/Jenny K. Harbine  
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