

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

SOUTHERN UTAH WILDERNESS)
ALLIANCE, *et al.*,)

Plaintiffs,)

v.)

DEBRA HAALAND, in her official)
capacity as Secretary of the Interior, *et al.*,)

Federal Defendants,)

and)

PURE HELIUM, LLC, *et al.*,)

Defendant-Intervenors.)

Case No. 1:20-cv-03654-RC
The Honorable Rudolph Contreras

JOINT STATUS REPORT

On December 8, 2021, the Court granted Plaintiffs’ and Federal Defendants’ joint motion for a stay of all deadlines and proceedings in this case for sixty days, to facilitate a negotiated final resolution to this case. On February 7, 2022, following a joint status report requesting continuation of the stay for another sixty days, the Court ordered the parties to file a joint status report on or before April 8, 2022, updating the Court on the status of those negotiations. *See* Order of February 7, 2022.

Plaintiffs and Federal Defendants continue to engage in earnest settlement discussions. They respectfully request that the stay of proceedings in this action be continued for another thirty days, until May 9, 2022, to allow them to finalize the terms of a settlement agreement and obtain the necessary approvals to formally enter into such an agreement. Achieving settlement in

this case will serve the interests of judicial efficiency and economy by avoiding further time-consuming and costly litigation, thus conserving the resources of the Court and the parties.

If at the end of the period of stay Plaintiffs and Federal Defendants are still in the midst of finalizing settlement, they will file a further joint status report updating the Court on the status of negotiations. However, if at the end of the period of stay Plaintiffs and Federal Defendants agree that they cannot reach a settlement, the parties will submit a proposed amendment to the briefing schedule previously established in this Court's November 10, 2021 Minute Order.

Dated: April 8, 2022

Respectfully submitted,

TODD KIM
Assistant Attorney General
United States Department of Justice
Environment and Natural Resources Div.

/s/ Arwyn Carroll
ARWYN CARROLL
Trial Attorney, Mass. Bar No. 675926
Natural Resources Section
P.O. Box 7611
Washington, D.C. 20044-7611
Phone: 202-305-0465
Fax: 202-305-0506
arwyn.carroll@usdoj.gov

Counsel for Federal Defendants

/s/ Steve H.M. Bloch (w/ permission)
Stephen H.M. Bloch (*pro hac vice*)
Landon Newell (*pro hac vice*)

Southern Utah Wilderness Alliance
425 East 100 South
Salt Lake City, UT 84111
(801) 486-3161

steve@suwa.org
landon@suwa.org

William S. Eubanks II
D.C. Bar No. 987036

William N. Lawton
D.C. Bar No. 1046604

Eubanks & Associates, PLLC
1331 H Street NW, Suite 902
Washington, DC 20005
(970) 703-6060
bill@eubankslegal.com
nick@eubankslegal.com

*Counsel for Plaintiffs Southern Utah
Wilderness Alliance, Center for
Biological
Diversity and Living Rivers*

Sharon Buccino
D.C. Bar No. 432073

Natural Resources Defense Council
1152 15th Street NW, Suite 300
Washington, D.C. 20005
(202) 289-6868
sbuccino@nrdc.org

*Counsel for Plaintiff
Natural Resources Defense Council*