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

WESTERN WATERSHEDS PROJECT,
CENTER FOR BIOLOGICAL DIVERSITY,
FRIENDS OF THE CLEARWATER,
WILDEARTH GUARDIANS, and
PREDATOR DEFENSE,

Plaintiffs,

v.

TODD GRIMM, Idaho Director,
Wildlife Services; USDA WILDLIFE
SERVICES,

Defendants.

No. 1:16-cv-218-EJL-CWD

**PLAINTIFFS' MOTION FOR
SUMMARY JUDGMENT**

Pursuant to Federal Rule of Civil Procedure 56, Local Rule 7.1, and the Joint Case Management Plan filed in this action (ECF No. 12), Plaintiffs Western Watersheds Project, Center for Biological Diversity, Friends of the Clearwater, WildEarth Guardians, and Predator Defense (Plaintiffs) hereby move the Court to enter summary judgment in their favor on the four claims for relief set forth in their Complaint.

Summary judgment is appropriate as the claims involve no genuine dispute of material fact, and Plaintiffs are entitled to judgment as a matter of law, as set forth more fully in the Opening Brief in Support and Separate Statement of Undisputed Facts accompanying this motion.

This motion is supported by the accompanying Plaintiffs' Separate Statement of Undisputed Facts; Opening Brief in Support of Motion for Summary Judgment; the Declarations of Kenneth Cole, Jon Marvel, Brett Haverstick, Greg Freistadt, Kelly E. Nokes, Richard Rusnak, David Hunt, and Dameon V. Hansen;¹ the Administrative Records filed by Defendants, as supplemented; the Complaint, Answer and other materials on file with the Court in this matter; and such other and further matters as may be presented to the Court before decision hereon.

WHEREFORE, Plaintiffs request that this Court grant this motion and enter summary judgment in their favor. As provided in the Joint Case Management Plan, Plaintiffs will move for appropriate remedies after the Court has resolved the merits of their claims on summary judgment.

DATED this 10th day of February, 2017. Respectfully submitted,

s/ Talasi B Brooks
Talasi B. Brooks
Attorney for Plaintiffs

¹ The eight declarations establish that Plaintiffs have standing to pursue this case.

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of February, 2017, I filed the foregoing PLAINTIFFS' MOTION FOR SUMMARY JUDGEMENT, along with the accompanying PLAINTIFFS' SEPARATE STATEMENT OF UNDISPUTED FACTS, PLAINTIFFS' OPENING BRIEF IN SUPPORT OF MOTION FOR SUMMARY JUDGEMENT, and DECLARATIONS OF KENNETH COLE, JON MARVEL, DAMEON V. HANSEN, KELLY E. NOKES, DAVID HUNT, RICHARD RUSNAK, BRETT HAVERSTICK, and GREG FREISTADT electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

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