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

ANNE HAUSRATH, JOHN WHEATON,  
JOANIE FAUCI, MEG FEREDAY, ROGER  
ROSENTRER, KATHRYN  
RAILSBACK, DALE REYNOLDS, and  
GREAT OLD BROADS FOR  
WILDERNESS,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF  
THE AIR FORCE,

Defendant.

No. 1:19-CV-00103-CWD

**PLAINTIFF’S MOTION FOR  
SUMMARY JUDGMENT**

Pursuant to Federal Rule of Civil Procedure 56, District of Idaho Local Rule 7.1, and the Litigation Order in this matter (ECF No. 11), Plaintiffs move the Court to enter summary judgment in their favor, and reverse and remand the Air Force’s November 2018 Final Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) for the “Urban Close Air Support Air and Ground Training Project” (Urban CAS Project), challenged in

Plaintiffs' Complaint herein. Summary judgment is appropriate as Plaintiffs' claims involve no genuine dispute of material fact, and Plaintiffs are entitled to judgment as a matter of law.

This Motion is supported by the accompanying Plaintiffs' Opening Brief in Support of Motion for Summary Judgment; Plaintiffs' Separate Statement of Material Facts; and Declarations of Dr. Jesse R. Barber, Pamela G. Conley, Joanie Fauci, Meg Fereday, Anne S. Hausrath, Kathryn Railsback, Dale Reynolds, Roger Rosentreter, and John Wheaton. This Motion is also supported by the pleadings and files before the Court, including the Administrative Record filed by Defendant, and such other matters as may be brought before the Court prior to the decision.

WHEREFORE, Plaintiffs respectfully request that the Court grant this Motion for Summary Judgment, enter summary judgment in their favor, and reverse and remand the challenged Urban CAS Project EA and FONSI.

Dated: January 15, 2020.

Respectfully submitted,

/s/ Laird J. Lucas

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January 15, 2020, I electronically filed the foregoing PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT, and the accompanying PLAINTIFFS' OPENING BRIEF IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT, PLAINTIFFS' SEPARATE STATEMENT OF MATERIAL FACTS, and DECLARATIONS OF DR. JESSE R. BARBER, PAMELA G. CONLEY, JOANIE FAUCI, MEG FEREDAY, ANNE S. HAUSRATH, KATHRYN RAILSBACK, DALE REYNOLDS, ROGER ROSENTERER, and JOHN WHEATON 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:

Christine England  
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/s/ Laird J. Lucas  
Laurence ("Laird") J. Lucas