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16 **UNITED STATES DISTRICT COURT FOR THE**
17 **EASTERN DISTRICT OF CALIFORNIA**

18 SIERRA SNOWMOBILE FOUNDATION, a)
nonprofit corporation; JEFF WITTMAN; MARY)
19 KRUPKA; JOHN WATTS; BLUERIBBON)
COALITION, INC., a nonprofit corporation;)
20 AMERICAN COUNCIL OF SNOWMOBILE)
ASSOCIATION INC., a nonprofit corporation,)

21 Plaintiffs,

22 vs.

23 UNITED STATES FOREST SERVICE, Pacific)
Southwest Region; JASON KUIKEN, in his)
24 capacity as Forest Supervisor for the Stanislaus)
National Forest; UNITED STATES)
25 DEPARTMENT OF AGRICULTURE, United)
26 States Forest Service,)

27 Federal Defendants.)
28

Case No.: 2:21-CV-01913-JAM-DB
**MOTION TO INTERVENE BY
WILDEARTH GUARDIANS AND
CALIFORNIA WILDERNESS
COALITION**

Hearing Date: February 22, 2022
Hearing Time: 1:30 p.m. PT
Judge: Honorable John A. Mendez

MOTION

This motion is made following the conference of counsel pursuant to the Court’s standing order which took place on January 12, 2022. Both Federal Defendants and Plaintiffs advised that they take no position on this motion until they read Conservation Organizations’ filings.

Proposed Intervenors WildEarth Guardians and California Wilderness Coalition (collectively, “Conservation Organizations”) hereby move to intervene as defendants and cross-claimants in this action. Conservation Organizations’ intervention is warranted under both Rules 24(a) and 24(b) of the Federal Rules of Civil Procedure.

As set forth in the accompanying memorandum and supporting declarations of Chris Krupp, Darca Morgan, and Steven Evans, Conservation Organizations’ intervention is necessary to protect the advocacy, conservation, recreational, and aesthetic interests of Conservation Organizations and their members in the Stanislaus National Forest and the U.S. Forest Service’s July 2021 Record of Decision for Over-snow Vehicle Travel Management in the Stanislaus National Forest. As required by Federal Rule of Civil Procedure 24(c), applicants also submit a proposed answer to Plaintiffs’ complaint.

Dated: January 21, 2022

Respectfully submitted,

/s/ Jessica L. Blome
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CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of January 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which in turn automatically generated a Notice of Electronic Filing to all parties in the case who are registered users of the CM/ECF system, causing the following counsel to be served by electronic means:

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Dated: January 21, 2022

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