## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NORTH DAKOTA WESTERN DIVISION

SPIRIT LAKE TRIBE, on its own behalf and on behalf of its members, STANDING ROCK SIOUX TRIBE, on its own behalf and on behalf of its members, DION JACKSON, KARA LONGIE, KIM TWINN, TERRY YELLOW FAT, LESLIE PELTIER, CLARK PELTIER,

Lead Case No. 1:18-cv-00222

Plaintiffs,

v.

ALVIN JAEGER, in his official capacity as Secretary of State,

Defendant.

RICHARD BRAKEBILL, DELLA MERRICK, ELVIS NORQUAY, RAY NORQUAY, and LUCILLE VIVIER, on behalf of themselves,

Plaintiffs,

v.

Consolidated Case No. 1:16-cv-8

ALVIN JAEGER, in his official capacity as Secretary of State,

Defendant.

## ASSENTED MOTION FOR ENTRY OF CONSENT DECREE

Pursuant to a settlement agreement among the parties to this consolidated action, the parties respectfully request that the Court approve the proposed consent decree attached as Exhibit 1 hereto and enter it as an Order of this Court. Counsel for all parties in the consolidated cases have approved this motion.

Dated: April 24, 2020

Matthew Campbell, NM Bar No. 138207, CO Bar No. 40808 NATIVE AMERICAN RIGHTS FUND 1506 Broadway Boulder, Colorado 80302 Phone: (303) 447-8760 mcampbell@narf.org

Jacqueline De León CA Bar No. 288192, DC Bar No.1023035 NATIVE AMERICAN RIGHTS FUND 1506 Broadway Boulder, Colorado 80302 jdeleon@narf.org

Joseph M. Sellers, Bar No. 318410 COHEN MILSTEIN SELLERS & TOLL PLLC 1100 New York Avenue, N.W. Suite 500, East Tower Washington, DC 20005 Telephone: (202) 408-4600 Facsimile: (202) 408-4699 jsellers@cohenmilstein.com Respectfully submitted,

Timothy Q. Purdon (ND# 05392) ROBINS KALPAN LLP 1207 West Divide Avenue Suite 200 Bismarck, ND 58503 T: (701) 255-3000 F: (612) 339-4181 TPurdon@RobinsKaplan.com

/s/ Mark P. Gaber
Mark P. Gaber
D.C. Bar No. 988077
Danielle M. Lang
D.C. Bar No. 1500218
Molly Danahy
D.C. Bar No. 1643411
CAMPAIGN LEGAL CENTER
1101 14th Street NW, Suite 400
Washington, DC 20005
(202) 736-2200
mgaber@campaignlegal.org
dlang@campaignlegal.org
mdanahy@campaignlegal.org

Counsel for Plaintiffs