

discrete, legally required action that Interior has failed to take, as is required to state a claim under 5 U.S.C. § 706(1). For these reasons, the claims against Interior should be dismissed.

Respectfully submitted,

JEAN WILLIAMS
Deputy Assistant Attorney General

Of Counsel:

*Rebekah Krispinsky
Charles R. Babst, Jr.
Department of the Interior*

/s/ Amber Blaha
AMBER BLAHA, D.C. Bar No. 471008
SARA E. COSTELLO
Environment and Natural Res. Div.
U.S. Department of Justice
P.O. Box 7415, Ben Franklin Station
Washington, D.C. 20044
(202) 616-5515
Amber.blaha@usdoj.gov

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