

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF LOUISIANA**

RIVERS END OUTFITTERS, LLC, et al.	:	Civil Action No. 2:20-cv-2312
	:	
<i>Plaintiffs,</i>	:	Section “E” (1)
	:	
v.	:	Judge Susie Morgan
	:	
U.S. DEPARTMENT OF COMMERCE, et al.	:	Magistrate Judge Janis van Meerveld
	:	
	:	
	:	
	:	Motion to Certify Class
<i>Defendants.</i>	:	(Oral Argument Requested)

MOTION OF PLAINTIFFS TO CERTIFY CLASS

COME NOW, the Plaintiffs, Captain Billy Wells and Mexican Gulf Shipping Company (“Mexican Gulf”), Captain Allen Walburn and A&B Charters, Inc. (“A&B”), Captain Kraig Dafcik, Captain Joseph Dobin and Captain Joey D. Charters (“Joey D. Charters”), Captain Frank Ventimiglia and Ventimiglia Charters, and Captain Jim Rinckey and Fishing Charters of Naples (“Fishing Charters”), and move this Court for an Order certifying a class of “Gulf For-hire vessel charter boat owners and operators who are permitted to fish by the Fishery Management Councils of the Gulf of Mexico and South Atlantic and are harmed by the Final Rule ” which is the subject of the Complaint in this matter and numbering approximately 1,298 individuals and corporations and appointing each of the Plaintiffs as class representatives and appointing New Civil Liberties Alliance, (“NCLA”) it attorneys John J. Vecchione and Kara Rollins as class counsel.

This motion is opposed by Defendants and an accompanying Memorandum in Support of this motion with Declarations attached is submitted with this motion.

Dated: November 19, 2020

Respectfully submitted,

**GORDON, ARATA, MONTGOMERY,
BARNETT, McCOLLAM, DUPLANTIS
& EAGAN, LLC**

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NEW CIVIL LIBERTIES ALLIANCE

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