UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

RIVERS END OUTFITTERS, LLC, ET AL.,

Plaintiffs,

v.

No. 2:20-cy-2312

U.S. DEPARTMENT OF COMMERCE, ET AL.,

Federal Defendants.

Federal Defendants' Cross-Motion for Summary Judgment

Federal Defendants submit this cross-motion for Summary Judgment on all counts of the First Amended Complaint, ECF No. 54, pursuant to the Federal Rules of Civil Procedure 56. An accompanying memorandum in support of this motion and a Statement of Undisputed Facts and Response to Plaintiff's Statement of Undisputed Facts is submitted with this motion.

Dated: September 24, 2021

Respectfully submitted,
TODD KIM
Assistant Attorney General
U.S. Department of Justice
Environment & Natural Resources Division

/s/ Shampa A. Panda SHAMPA A. PANDA Trial Attorney (CA Bar No. 316218) Wildlife & Marine Resources Section Ben Franklin Station, P.O. Box 7611 Washington, DC 20044-7611 Tel: (202) 305-0431 shampa.panda@usdoj.gov

NICOLE M. SMITH

Trial Attorney (CA Bar No. 303629) Wildlife & Marine Resources Section Ben Franklin Station, P.O. Box 7611 Washington, DC 20044-7611 Tel: (202) 305-0368 Nicole.M.Smith@usdoj.gov

ELIZABETH CHICKERING Assistant United States Attorney Eastern District of Louisiana 650 Poydras Street, Suite 1600 New Orleans, LA 70130 Tel: (504) 680-3180 Elizabeth.Chickering@usdoj.gov

Of Counsel:

MARA LEVY
Attorney-Advisor
Office of the General Counsel
National Oceanic and Atmospheric
Administration
U.S. Department of Commerce
263 13th Avenue South
St. Petersburg, FL 33701
Telephone: (727) 824-5302
mara.levy@noaa.gov

Attorneys for Federal Defendants

CERTIFICATE OF SERVICE

I hereby certify that on September 24, 2021, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send electronic notification of such filing to all counsel of record.

/s/ Shampa A. Panda