

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

Iowa Citizens for Community Improvement, Animal  
Legal Defense Fund, Association of Irrigated  
Residents, Institute for Agriculture and Trade Policy,  
Waterkeeper Alliance, Inc., Waterkeepers  
Chesapeake,

*Plaintiffs,*

v.

Council on Environmental Quality *and*  
Mary Neumayr, in her official capacity as  
Chair of the Council on Environmental Quality,

*Defendants,*

American Farm Bureau Federation, American Forest  
Resource Council, American Fuel & Petrochemical  
Manufacturers, American Petroleum Institute,  
American Road & Transportation Builders  
Association, Chamber of Commerce of the United  
States of America, Federal Forest Resource Coalition,  
Interstate Natural Gas Association of America,  
Laborers' International Union of North America, and  
National Cattlemen's Beef Association,

*Proposed Intervenors.*

No. 1:20-cv-02715

Hon. Timothy J. Kelly

**MEMORANDUM OF LAW IN SUPPORT OF  
MOTION TO INTERVENE AS DEFENDANTS**

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