

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

AMERICAN SOYBEAN ASSOCIATION
and PLAINS COTTON GROWERS,

Plaintiffs,

v.

ANDREW R. WHEELER, et. al.

Defendants,

and

BASF CORPORATION,

Proposed Defendant-Intervenor.

Civil Action No. 1:20-cv-03190 (RCL)

UNOPPOSED MOTION TO INTERVENE BY BASF CORPORATION

BASF Corporation (“BASF”) moves this Court for leave to intervene in this case pursuant to Rule 24 of the Federal Rules of Civil Procedure and Local Rule 7(j). BASF seeks intervention as of right to participate fully in this action pursuant to Rule 24(a)(2), or in the alternative, permissive intervention under Rule 24(b)(1)(B). In addition, BASF requests that BASF’s deadline to file a responsive pleading be extended until such time as the Federal Defendants are required to file their responsive pleading, or until such other time set by subsequent order of this Court. A Memorandum in Support and a Proposed Order are also filed with this Motion.

Pursuant to Local Rule 7(m), BASF contacted counsel for Plaintiffs and for Defendants, and Plaintiffs and Defendants indicated that they do not oppose this motion to intervene or the request to defer the deadline for filing a responsive pleading.

Date: November 10, 2020

Respectfully submitted,

/s/ David A. Barker

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**PROPOSED DEFENDANT- INTERVENOR BASF CORPORATION'S
MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF
MOTION TO INTERVENE**

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