

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

AMERICAN SOYBEAN ASSOCIATION
and PLAINS COTTON GROWERS, INC.

Plaintiffs,

v.

ANDREW R. WHEELER, MARIETTA
ECHEVERRIA, and UNITED STATES
ENVIRONMENTAL PROTECTION
AGENCY

Defendants,

and

BAYER CROPSCIENCE LP

*Proposed
Defendant-Intervenor.*

Case No.: 1:20-cv-03190-RCL

**UNOPPOSED MOTION OF BAYER CROPSCIENCE LP
TO INTERVENE AS A DEFENDANT**

Bayer CropScience LP (“Bayer”) respectfully moves to intervene as of right as a defendant in this case pursuant to Federal Rule of Civil Procedure 24(a)(2) or alternatively seeks permissive intervention pursuant to Rule 24(b)(1)(B). The points and authorities supporting this motion are set forth in Bayer’s attached memorandum of law. Bayer also seeks leave to file its Answer or other responsive pleading pursuant to Federal Rule of Civil Procedure 24(c) and Local Civil Rule 7(j) on the same date as Federal Defendants in this matter.

Pursuant to Local Civil Rule 7(m), counsel for Bayer has conferred with the parties regarding this motion. Counsel for Plaintiffs American Soybean Association and Plains Cotton Growers, Inc. and counsel for Defendants have indicated that Plaintiffs and Defendants do not oppose this motion to intervene.

Date: November 11, 2020

Respectfully submitted,

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**MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF UNOPPOSED
MOTION OF BAYER CROPSCIENCE LP TO INTERVENE AS A DEFENDANT**

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