

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

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STATE OF LOUISIANA, ET AL. )  
 )  
Plaintiffs, )  
 )  
v. )  
 )  
JOSEPH R. BIDEN, JR., in his official capacity )  
as President of the United States, )  
 )  
DEBRA HAALAND, in her official capacity as )  
the Secretary of the Interior, )  
 )  
MICHAEL NEDD, in his official capacity as )  
the Deputy Director of the Bureau of Land )  
Management, )  
 )  
CHAD PADGETT, in his official capacity as )  
the Director of the Bureau of Land Management )  
Alaska Office, )  
 )  
RAYMOND SUAZO, in his official capacity as )  
the Director of the Bureau of Land Management )  
Arizona Office, )  
 )  
KAREN MOURITSEN, in her official capacity )  
as the Director of the Bureau of Land )  
Management California Office, )  
 )  
JAMIE CONNELL, in his official capacity as )  
the Director of the Bureau of Land Management )  
Colorado Office, )  
 )  
MITCHELL LEVERETTE, in his official )  
capacity as the Director of the Bureau of Land )  
Management Eastern States Office, )  
 )  
JOHN RUHS, in his official capacity as the )  
Director of the Bureau of Land Management )  
Idaho Office, )  
 )  
JOHN MEHLHOFF, in his official capacity as )  
the Director of the Bureau of Land Management )  
Montana-Dakotas Office, )  
 )  
JON RABY, in his official capacity as the )  
Director of the Bureau of Land Management )  
Nevada Office, )

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Case No. 2:21-cv-00778

Honorable Judge Terry A. Doughty

Magistrate Judge Kathleen Kay

STEVE WELLS, in his official capacity as the Acting Director of the Bureau of Land Management New Mexico Office,

BARRY BUSHUE, in his official capacity as the Director of the Bureau of Land Management Oregon-Washington Office,

GREG SHEEHAN, in his official capacity as the Director of the Bureau of Land Management Utah Office,

KIM LIEBHAUSER, in her official capacity as the Acting Director of the Bureau of Land Management Wyoming Office,

AMANDA LEFTON, in her official capacity as the Director of the Bureau of Ocean Energy Management,

MICHAEL CELATA, in his official capacity as the Regional Director of the Bureau of Ocean Energy Management Gulf of Mexico Office,

LARS HERBST, in his official capacity as the Regional Director of the Bureau of Safety and Environmental Enforcement Gulf of Mexico OCS Office, and

MARK FESMIRE, in his official capacity as the Regional Director of the Bureau of Safety and Environmental Enforcement Alaska and Pacific Office,

Defendants.

**All Defendants' Notice of Appeal**

Pursuant to Federal Rule of Appellate Procedure 4(a)(1)(B) and 28 U.S.C. § 1292(a)(1), all Defendants<sup>1</sup> give notice that they appeal to the United States Court of Appeals for the Fifth

<sup>1</sup> Defendants consist of Joseph R. Biden, Jr., in his official capacity as the President of the United States, Debra Haaland, in her official capacity as the Secretary of the Interior, Michael Nedd, in his official capacity as the Deputy Director of the Bureau of Land Management, Chad Padgett, in his official capacity as the Director of the Bureau of Land Management Alaska Office, Raymond Suazo, in his official capacity as the Director of the Bureau of Land Management Arizona Office, Karen Mouritsen, in her official capacity as the Director of the Bureau of Land Management California Office, Jamie Connell, in his official capacity as the Director of the

Circuit, the Memorandum Ruling [Doc. No. 139] and Order [Doc No. 140] on Plaintiff States' Motion for a Preliminary Injunction, attached hereto as exhibits A and B, respectively, issued by the Honorable Judge Terry A. Doughty on June 15, 2021.

Respectfully submitted this 16th day of August, 2021.

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

*/s/ Thomas W. Ports, Jr.*

THOMAS W. PORTS, JR.

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*Counsel for Defendants*

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Bureau of Land Management Colorado Office, Mitchell Leverette, in his official capacity as the Director of the Bureau of Land Management Eastern States Office, John Ruhs, in his official capacity as the Director of the Bureau of Land Management Idaho Office, John Mehlhoff, in his official capacity as the Director of the Bureau of Land Management Montana-Dakotas Office, Jon Raby, in his official capacity as the Director of the Bureau of Land Management Nevada Office, Steve Wells, in his official capacity as the Acting Director of the Bureau of Land Management New Mexico Office, Barry Bushue, in his official capacity as the Director of the Bureau of Land Management Oregon-Washington Office, Greg Sheehan, in his official capacity as the Director of the Bureau of Land Management Utah Office, Kim Liebhauser, in her official capacity as the Acting Director of the Bureau of Land Management Wyoming Office, Amanda Lefton, in her official capacity as the Director of the Bureau of Ocean Energy Management, Michael Celata, in his official capacity as the Regional Director of the Bureau of Ocean Energy Management Gulf of Mexico Office, Lars Herbst, in his official capacity as the Regional Director of the Bureau of Safety and Environmental Enforcement Gulf of Mexico OCS Office, and Mark Fesmire, in his official capacity as the Regional Director of the Bureau of Safety and Environmental Enforcement Alaska and Pacific Office.