

1 IGNACIA S. MORENO, Assistant Attorney General
 2 SETH M. BARSKY, Section Chief
 KRISTEN L. GUSTAFSON, Assistant Section Chief
 3 ERIK E. PETERSEN, Trial Attorney
 4 ANDREA GELATT, Trial Attorney
 U.S. Department of Justice
 5 Environment and Natural Resources Division
 6 Wildlife and Marine Resources Section
 Ben Franklin Station, P.O. Box 7369
 7 Washington, D.C. 20044-7369
 8 (202) 305-0210 | (202) 305-0275 (fax)
 Attorneys for Federal Defendants
 9

10 **UNITED STATES DISTRICT COURT FOR THE**
 11 **DISTRICT OF MONTANA**
 12 **MISSOULA DIVISION**

13	ALLIANCE FOR THE WILD ROCKIES, et al.,)	CASE NOS.
14	Plaintiffs,)	11-cv-70-M-DWM;
15	v.)	11-cv-71-M-DWM
16	KEN SALAZAR, et al.,)	FEDERAL DEFENDANTS'
17	Defendants.)	CROSS MOTION FOR
18)	SUMMARY JUDGMENT
19	CENTER FOR BIOLOGICAL DIVERSITY,)	
20	et al.,)	
21	Plaintiff,)	
22	v.)	
23	KEN SALAZAR, et al.,)	
24	Defendants.)	

25 Pursuant to Fed. R. Civ. P. 56, L.R. 56.1, and the Court's Orders of May 13,
 26 2011 (Dkt. # 8) and May 24, 2011 (Dkt. # 16), Federal Defendants hereby cross
 27 move for summary judgment on all Plaintiffs' claims in the consolidated action
 28

1 Civil Action No. 11-70-M-DWM, Civil Action No. 11-71-M-DWM.

2 As required by L.R. 56.1 Federal Defendants' Cross Motion is supported by
3 a separate Statement of Undisputed Facts and its Opposition is supported by a
4 Statement of Genuine Issues. The Cross Motion/Opposition is accompanied by a
5 supporting brief. *See* CV-11-70-M-DWM, Dkts. # 8, 16.

6 This Cross Motion is opposed.

7 Respectfully submitted June 14, 2011,

8

9

10 IGNACIA S. MORENO,
11 Assistant Attorney General
12 SETH M. BARSKY, Section Chief
13 KRISTEN L. GUSTAFSON, Assistant Section Chief

14

15 /s/ Andrea Gelatt
16 ANDREA E. GELATT (CA Bar # 262617)
17 ERIK E. PETERSEN
18 Wildlife & Marine Resources Section
19 Environment & Natural Resources Division
20 U.S. Department of Justice
21 P.O. Box 7369
22 Washington, D.C. 20044-7369
23 Tel: (202) 305-0210 | Fax: (202) 305-0275
24 andrea.gelatt@usdoj.gov
25 Counsel for Federal Defendants
26
27
28

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that today a true and correct copy of the foregoing
was served on the counsel of record via the ECF system.

/s/ Andrea E. Gelatt

ANDREA E. GELATT