

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

MANDAN, HIDATSA AND	)	
ARIKARA NATION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 1:18-cv-01462-CRC
	)	
THE UNITED STATES DEPARTMENT	)	
OF THE INTERIOR, RYAN ZINKE,	)	
in his official capacity as Secretary of the Interior	)	
	)	
Defendants,	)	
	)	

**FEDERAL DEFENDANTS’ JOINDER IN SLAWSON’S  
MOTION TO TRANSFER VENUE**

The United States Department of the Interior and Ryan Zinke (collectively, “Federal Defendants”) hereby join in Slawson’s Motion to Transfer Venue (ECF No. 18) under 28 U.S.C. § 1404(a) and move to transfer this action to the United States District Court for the District of North Dakota. Transfer is appropriate here for the reasons outlined in Slawson’s Motion, including that Plaintiff resides on the Fort Berthold Indian Reservation in west-central North Dakota (*see* Compl. ¶ 11, ECF No. 1) and the case centers on Federal Defendants’ approval of Slawson’s permits to drill on fee land located within the Reservation. In addition, the United States District Court for the District of North Dakota has already heard a challenge to the permits at issue filed by Slawson, and thus is familiar with the facts of the case. Beyond Federal Defendants’ location in the District of Columbia, this case has no meaningful ties to this District. Federal Defendants thus respectfully join in Slawson’s request that the case be transferred to the District of North Dakota.

Respectfully submitted this 17th day of September, 2018.

JEFFREY H. WOOD  
Acting Assistant Attorney General  
Environment & Natural Resources Division

*s/ Devon Lehman McCune*  
DEVON LEHMAN McCUNE  
Senior Attorney  
U.S. Department of Justice  
Environment & Natural Resources Division  
Natural Resources Section  
999 18th St., South Terrace, Suite 370  
Denver, CO 80202  
Tel: (303) 844-1487  
Fax: (303) 844-1350  
[devon.mccune@usdoj.gov](mailto:devon.mccune@usdoj.gov)

OF COUNSEL  
Curt R. Sholar  
Attorney-Advisor  
Office of the Solicitor  
Rocky Mountain Region  
United States Department of the Interior

**CERTIFICATE OF SERVICE**

I hereby certify that on the 17th day of September, 2018, a copy of the foregoing was filed through the Court's CM/ECF management system and electronically served on counsel of record.

/s/ Devon Lehman McCune

Devon Lehman McCune

Senior Attorney