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UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

| | | |
|------------------------------|---|------------------------------|
| BARTELL RANCH LLC, et al., |) | Case No.: 3:21-cv-80-MMD-CLB |
| |) | (LEAD CASE) |
| Plaintiffs, |) | |
| |) | |
| v. |) | ENVIRONMENTAL PLAINTIFFS' |
| |) | JOINDER TO BARTELL RANCH'S |
| ESTER M. MCCULLOUGH, et al., |) | MOTION TO COMPLETE AND |
| |) | SUPPLEMENT THE |
| Defendants, |) | ADMINISTRATIVE RECORD |
| and |) | (ECF #108) |
| |) | |
| LITHIUM NEVADA CORPORATION, |) | |
| |) | |
| Intervenor-Defendant. |) | |

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|----|-------------------------------------|---|-------------------------------|
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| 2 | WESTERN WATERSHEDS PROJECT, et al., |) | Case No.: 3:21-cv-103-MMD-CLB |
| 3 | Plaintiffs, |) | (CONSOLIDATED CASE) |
| 4 | |) | |
| 5 | RENO SPARKS INDIAN COLONY, et al., |) | |
| 6 | Intervenor-Plaintiffs, |) | |
| 7 | and |) | |
| 8 | BURNS PAIUTE TRIBE, |) | |
| 9 | Intervenor-Plaintiff. |) | |
| 10 | v. |) | |
| 11 | UNITED STATES DEPARTMENT OF THE |) | |
| 12 | INTERIOR, et al., |) | |
| 13 | Defendants, |) | |
| 14 | and |) | |
| 15 | LITHIUM NEVADA CORPORATION, |) | |
| 16 | <u>Intervenor-Defendant.</u> |) | |

17

18 Environmental Plaintiffs Western Watersheds Project (“WWP”) et al. join in Plaintiff

19 Bartell Ranch LLC’s Motion to Complete and Supplement the Administrative Record, ECF #108

20 (Oct. 22, 2021). In particular, as noted in WWP’s record motion at n.3, ECF #111 (Oct. 22,

21 2021), WWP shares Bartell Ranch’s concerns that communications with third parties, as well as

22 intra-agency and inter-agency communications, were improperly excluded from the Record, as

23 were field data reports used in preparation of reports, memoranda, and analyses. WWP also

24 raised these issues with BLM, but BLM either failed to respond to their concerns or else claimed

25 the records requested were deliberative. *See* Flynn Decl. at 9-11, 16-18, ECF #111-1 (Oct. 22,

26 2021).

27 Respectfully submitted this 25th day of October, 2021.

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I, Talasi Brooks, hereby attest that I served the foregoing on all parties via this Court's ECF system, this 25th day of October, 2021.

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