

Exhibit 1 -

Declaration of Catherine Clark

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 BARTELL RANCH, LLC, et al.,
4 Plaintiffs,
5 v.

Lead Case:
Case No. 3:21-cv-00080-MMD-CLB

6 ESTER M. McCULLOUGH, et al.,
7 Defendants,
8 and
9 LITHIUM NEVADA CORP.,
10 Defendant-Intervenor.

11 **DECLARATION OF CATHERINE CLARK**

12 I, Catherine Clark, hereby attest as follows:

13 1. I am over eighteen years old, have personal knowledge of the matters set forth in
14 this Declaration, and am competent to testify as to the matters set forth herein. The facts set
15 forth herein are based on my personal knowledge gained in the course of my business activities.

16 **Basis for Personal Knowledge**

17 2. I am the Environmental Director for Lithium Nevada Corporation (“Lithium
18 Nevada”). I have served in this role for more than ten years since June 2011 and have over thirty
19 years of experience in project management and development and environmental regulatory
20 compliance. Through my decades of work in regulatory compliance in the mining industry I am
21 also familiar with the National Environmental Policy Act (“NEPA”) process for mining projects.

22 3. Since 2011, I have been working in the Thacker Pass area. Lithium Nevada (and
23 formerly Western Lithium Corporation) has been working since 2011 on collecting baseline
24 environmental data, collaborating with local stakeholders, and engaging with state and federal
25 agencies to design and permit one of the most advanced and environmentally sound lithium
26 projects in the world at Thacker Pass.

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1 4. I am substantively engaged with Lithium Nevada's involvement in the NEPA
2 process and am the primary point of contact for the Bureau of Land Management ("BLM") in
3 transmitting and receiving requests for data and data submissions.

4 5. Lithium Nevada did not receive or review the administrative draft copy of the
5 Preliminary Draft Environmental Impact Statement ("PDEIS") that BLM circulated amongst
6 cooperating federal and state entities prior to publication. After reviewing my files and emails
7 and speaking with the other Lithium Nevada employees I can confirm that Lithium Nevada did
8 not receive or review the PDEIS. Lithium Nevada did not receive the DEIS prior to its release to
9 the public on July 31, 2020.

10 Executed on November _11_, 2021 in Reno, Nevada.

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14 Catherine Clark
15 *Lithium Nevada Corp.*
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