

BART M. DAVIS, IDAHO STATE BAR NO. 2696  
United States Attorney  
CHRISTINE G. ENGLAND, CALIFORNIA STATE BAR NO. 261501  
Assistant United States Attorney  
District of Idaho  
Washington Group Plaza IV  
800 East Park Boulevard, Suite 600  
Boise, ID 83712-7788  
Tel: (208) 334-1211  
Email: [Christine.England@usdoj.gov](mailto:Christine.England@usdoj.gov)

PRERAK SHAH  
Deputy Assistant Attorney General  
Environment and Natural Resources Division  
BARCLAY T. SAMFORD, NM State Bar No. 12323  
LUTHER L. HAJEK  
U.S. Department of Justice  
Environment and Natural Resources Division  
Natural Resources Section  
999 18th Street, South Terrace, Suite 370  
Denver, CO 80202  
Tel: (303) 844-1376 (Hajek)  
(303) 844-1475 (Samford)  
E-mail: [luke.hajek@usdoj.gov](mailto:luke.hajek@usdoj.gov)  
[clay.samford@usdoj.gov](mailto:clay.samford@usdoj.gov)

Attorneys for Defendants

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF IDAHO

TUGAW RANCHES, LLC,

Plaintiff,

HON. BRAD LITTLE, *et al.*

Plaintiffs-Intervenors

v.

UNITED STATES DEPARTMENT OF THE  
INTERIOR, *et al.*,

Defendants.

Case No. 4:18-cv-00159-DCN

**STIPULATION OF DISMISSAL**

As set forth below the parties to this case stipulate to dismissal of this case under Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure.

1. The Plaintiff, Tugaw Ranches, and Plaintiff-Intervenors, Governor Brad Little, Speaker of the Idaho House of Representatives, Scott Bedke, and President Pro Tempore of the Idaho Senate, Brent Hill, allege the Defendants, the Bureau of Land Management (“BLM”) and the Forest Service violated the Congressional Review Act (“CRA”) by issuing Land Use Plan Amendments relating to the Greater Sage-Grouse in 2015 without submitting the Records of Decisions (RODs) for the amendments to Congress (“2015 Plan Amendments”).

2. On March 15, 2019, BLM submitted the 2015 Plan Amendment RODs to Congress.

3. On February 3, 2020, the Forest Service submitted its 2015 Plan Amendment RODs to Congress.

4. The parties agree that the agencies’ submission of their 2015 Plan Amendment RODs to Congress obviates the need for additional litigation on the merits.

Thus the parties hereby stipulate under Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure to the voluntary dismissal of this case. This dismissal does not require any action by the Court. *See* Fed. R. Civ. P. Rule 41(a)(1)(A).

Respectfully submitted this 7th day of February, 2020,

BART M. DAVIS  
United States Attorney  
CHRISTINE ENGLAND  
Assistant United States Attorney  
U.S. Attorney’s Office, District of Idaho

PRERAK SHAH  
Acting Deputy Assistant Attorney General  
Environment and Natural Resources Division

/s/Barclay T. Samford

BARCLAY T. SAMFORD

LUTHER L. HAJEK

U.S. Department of Justice

Environment and Natural Resources Division

Attorneys for Defendants

EDWARD DINDINGER

Dindinger & Kohler, PLLC

JONATHAN WOOD

TODD F. GAZIANO

JEFFREY W. McCOY

CALEB R. TROTTER

Pacific Legal Foundation

/s/ Jonathan Wood

JONATHAN WOOD

Attorneys for Plaintiff Tugaw Ranches, LLC

OFFICE OF GOVERNOR BRAD LITTLE

/s/ Samuel J. Eaton

Samuel J. Eaton

Counsel for Plaintiff-Intervenor Hon. Brad Little

HOLLAND & HART LLP

/s/William G. Myers III

William G. Myers III

Counsel for Plaintiffs-Intervenors Hon. Scott Bedke and

Hon. Brent Hill