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

SAFARI CLUB INTERNATIONAL, *et al.*)
)
Plaintiffs,)
)
v.)
)
SALLY JEWELL, *et al.*,)
)
Defendants, and)
)
FRIENDS OF ANIMALS,)
777 Post Road, Suite 205)
Darien, CT 06820;)
ZIMBABWE CONSERVATION TASK FORCE,)
3 Fairbairn Drive, Mount Pleasant, Harare,)
Zimbabwe)
)
Proposed Defendant-Intervenors.)
)
)
)

Case No. 1:14-CV-00670 (RCL)

UNOPPOSED MOTION TO STAY BRIEFING (MOTION TO INTERVENE)

Proposed Defendant-Intervenors, Friends of Animals and the Zimbabwe Conservation Task Force (collectively, “Applicants”), respectfully move the Court for an order to stay briefing and resolution of their Motion To Intervene, which is being filed

simultaneously with this Motion, until ten (10) days after the Court rules on Federal Defendants' pending Motion to Dismiss (ECF 11, 36).

Pursuant to Federal Rule of Civil Procedure 24, Applicants are required to file a motion to intervene in a timely manner. However, the Court currently has pending before it a Motion to Dismiss several claims that, if granted in whole or part might appreciably change the nature of this case. While Applicants do not believe resolution of the Motion to Dismiss would moot their Motion to Intervene, it certainly could alter it. Thus, after conferring with the government, Applicants request that briefing of this Motion for Intervention be stayed. Specifically, Applicants propose to submit their points and authorities setting forth the reasons for intervention ten (10) days after the Court resolves Defendants' Motion to Dismiss. This will allow the Applicants to tailor their arguments based upon the remaining claims, if any, and ensure that the existing parties are not forced to brief this Motion prematurely. Thus, granting this Motion to Stay will save judicial resources and avoid unnecessary briefing on claims that may be mooted by the Court's judgment.

Pursuant to Local Rule 7(m), counsel for Applicants has conferred with counsel for Plaintiffs and Federal Defendants in this action. All existing parties have stated that they do not oppose this motion to stay briefing of the motion to intervene, but continue to take no position on the motion to intervene until after they have had an opportunity to review the full motion to intervene and memorandum in support.

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Therefore, Applicants requests the Court stay briefing on their Motion for Intervention so that it will be due ten (10) days from the date of the Court's resolution of the Federal Defendants' Motion to Dismiss. At that time, Applicants will submit a memorandum of points and authorities in support of their Motion to Intervene, supporting declarations, as well as a proposed Answer.

Respectfully submitted this 23rd day of December, 2014.

/s/ Michael Harris
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing, UNOPPOSED MOTION TO STAY BRIEFING OF MOTION TO INTERVENE, was served upon all counsel of record through the ECF system this 23rd day of December 2014.

/s/ Michael Harris
Michael Ray Harris (DC Bar # CO0049)