

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

CENTER FOR BIOLOGICAL
DIVERSITY, *et al.*,

Plaintiffs,

V.

LISA P. JACKSON, *et al.*,

Defendants.

Case No. 1:10-cv-2007 (EGS)

**DEFENDANT-INTERVENOR NATIONAL SHOOTING SPORTS
FOUNDATION, INC.'S PARTIAL ANSWER TO PLAINTIFFS'
COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF**

Defendant-Intervenor National Shooting Sports Foundation, Inc. (“NSSF”) hereby partially answers the Complaint for Declaratory and Injunctive Relief filed by Plaintiffs Center for Biological Diversity, Public Employees for Environmental Responsibility, and Project Gutpile (collectively, “Plaintiffs”), as follows.

Plaintiffs’ claim for relief pertaining to their request for an Environmental Protection Agency (“EPA”) rulemaking banning lead shot and bullets is the subject of Defendant-Intervenors’ motion to dismiss which is being filed today in lieu of an answer pursuant to Fed. R. Civ. P. 12(b)(1). Therefore, to the extent that the allegations in Plaintiffs’ Complaint relate to Plaintiffs’ claim for relief pertaining to lead shot and bullets, no response is required.

NSSF is without sufficient information to admit or deny the remaining allegations in the Complaint, which are relevant only to Plaintiffs' claim for relief pertaining to its request for an EPA rulemaking regarding banning lead fishing gear.

Dated: February 8, 2011

Respectfully submitted,

/s/ Roger R. Martella, Jr.
Roger R. Martella, Jr. (Bar No. 976771)
Christopher L. Bell (Bar No. 412857)
Ragu-Jara Gregg (Bar No. 495645)
SIDLEY AUSTIN LLP
1501 K Street, N.W.
Washington, D.C. 20005
(202) 736-8000
(202) 736-8711 (fax)

Attorneys for Defendant-Intervenor
NATIONAL SHOOTING SPORTS
FOUNDATION, INC.

Of Counsel
Lawrence G. Keane
General Counsel
National Shooting Sports Foundation
11 Mile Hill Road
Newtown, CT 06470-2359
(203) 426-1320

CERTIFICATE OF SERVICE

I hereby certify that on February 8, 2011, I electronically filed the foregoing DEFENDANT-INTERVENOR NATIONAL SHOOTING SPORTS FOUNDATION, INC.'S PARTIAL ANSWER TO PLAINTIFF'S COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF with the Clerk of Court using the CM/ECF system which will send notification of this filing to all attorneys of record.

/s/ Roger R. Martella, Jr. _____
Roger R. Martella, Jr. (Bar No. 976771)
SIDLEY AUSTIN LLP
1501 K Street, N.W.
Washington, D.C. 20005