

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

WHITE EARTH NATION, HONOR
THE EARTH, INDIGENOUS
ENVIRONMENTAL NETWORK,
MINNESOTA CONSERVATION
FOUNDATION, MN350, CENTER
FOR BIOLOGICAL DIVERSITY,
SIERRA CLUB, and NATIONAL
WILDLIFE FEDERATION,

Plaintiffs,

v.

JOHN KERRY, in his official
capacity as Secretary of State, and the
UNITED STATES DEPARTMENT
OF STATE,

Defendants.

Case No. 14-cv-4726 (MJD/LIB)

**ENBRIDGE ENERGY, LIMITED
PARTNERSHIP'S MOTION TO
INTERVENE**

Enbridge Energy, Limited Partnership (“Enbridge”) by and through the undersigned counsel, hereby respectfully submits this Motion to Intervene (“Motion”) as of right pursuant to Fed. R. Civ. P. 24(a)(2), or alternatively, to intervene permissively in this matter under Fed. R. Civ. P. 24(b)(1)(B). Intervention is sought so that Enbridge may appear in support of the named Defendants and file responsive pleadings to Plaintiffs’ Complaint [Doc. 1]. Enbridge also seeks an extension of its due date to submit a responsive pleading or motion on the same due date applicable to the Defendants with respect to the Plaintiffs’ first and second claims, i.e., the claims other than the Freedom of Information Act claims.

Enbridge has contacted the Plaintiffs' and Defendants' counsel regarding this Motion. Defendants' counsel indicated that the Defendants take no position with respect to this Motion. Plaintiffs' counsel indicated that Plaintiffs do not oppose this Motion, but that they intend to file a response to this Motion. Both counsel for Plaintiffs and Defendants agreed that a responsive pleading need not be filed with this Motion, and that the due date for Enbridge's responsive pleading may coincide with that of the Defendants if intervention is granted by this Court.

Enbridge's Motion is based upon its memorandum of law, supporting declarations, the arguments at the time of the hearing, and the entire record herein. A proposed order is submitted herewith.

Dated: December 5, 2014

Respectfully submitted,

/s/ Todd Wind

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