

**To:** Downey Magallanes[downey\_magallanes@ios.doi.gov]; Gary Lawkowski[gary\_lawkowski@ios.doi.gov]; Brian Steed[bsteed@blm.gov]; Casey Hammond[casey\_hammond@ios.doi.gov]  
**Cc:** Cally Younger[cally.younger@sol.doi.gov]; Daniel Jorjani[daniel.jorjani@sol.doi.gov]; Kevin Haugrud[jack.haugrud@sol.doi.gov]; Joshua Hanson[joshua.hanson@sol.doi.gov]; Ryan Sklar[ryan.sklar@sol.doi.gov]  
**From:** Moody, Aaron  
**Sent:** 2018-03-08T15:10:46-05:00  
**Importance:** Normal  
**Subject:** Re: Motion to dismiss -- Utah monuments cases  
**Received:** 2018-03-08T15:10:49-05:00

Hi, all:

Just re-upping this. We've reviewed and will have some comments to send back to DOJ, most of which are some technical legal points ((b)(5) ACP [REDACTED]). Does anyone that I haven't heard from already have comments and if so are you able to send by COB?

We will get another crack at a revised version before it is due next Friday, although it might be a pretty tight turnaround (e.g., a day or so).

thank you!

-Aaron

Aaron G. Moody  
Acting Associate Solicitor - Division of Land Resources

Office of the Solicitor  
U.S. Department of the Interior  
202-208-3495

NOTICE: This e-mail (including attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you receive this e-mail in error, please notify the sender immediately and destroy all copies.

On Tue, Mar 6, 2018 at 2:43 PM, Moody, Aaron <aaron.moody@sol.doi.gov> wrote:

ATTORNEY-CLIENT PRIVILEGED/ATTORNEY WORK PRODUCT  
All-

Attached is a draft motion to dismiss the challenges to the GSENM modification. It is due March 16, but given internal review at DOJ, they've asked for our comments (especially if we see any red flags) by COB Thursday, 3/8. (That said, if you don't have time to look at this version, we will get a chance to review another probably early next week, albeit with more limited opportunity to make significant changes). It's also possible there will be changes from DOJ management review, but I'll let you know if that happens as soon as I know. Also, this is all somewhat tentative in that if the Judge rules on the motion to transfer before the 16th and grants it we'll probably get some more time to file in D.Utah instead of here in DC.

(b)(5) ACP

Of course, please let us know if you have any questions. We're reviewing now and will let you know if we have any significant issues (which, based on a quick review, is unlikely, although I think we will definitely have some suggestions and line edits).

thanks!

-Aaron

Aaron G. Moody  
Acting Associate Solicitor - Division of Land Resources

Office of the Solicitor  
U.S. Department of the Interior  
202-208-3495

NOTICE: This e-mail (including attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you receive this e-mail in error, please notify the sender immediately and destroy all copies.