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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA**

NATIONAL AUDUBON SOCIETY, *et al.*,

Plaintiffs,

v.

DEBRA HAALAND, in her official capacity  
as Secretary of the United States Department  
of the Interior, *et al.*,

Defendants,

and

STATE OF ALASKA,

Intervenor-Defendant.

Case No. 3:20-cv-00206-SLG

**JOINT STATUS REPORT AND DEFENDANTS' REQUEST FOR STAY**

In accordance with the Court's order (ECF 33) dated July 13, 2021, the parties provide the following status report and Defendants request that the Court

grant their request for an extended stay of 120 days.

Defendants sought the stay in this litigation in order to allow new officials in the Department of the Interior the opportunity to review the 2020 Integrated Activity Plan (“IAP”) for the National Petroleum Reserve-Alaska (“NPR-A”), as well as this litigation. The Department of the Interior has completed its review and the Principal Deputy Assistant Secretary for Land and Minerals Management has recently signed a memorandum (attached hereto as Exhibit A) directing BLM to undertake an evaluation of the 2020 IAP/EIS and related documents for the purposes of potentially adopting a different alternative. As the memorandum from the Deputy Assistant Secretary reflects, BLM is to update Interior with its evaluation within 120 days (by January 3, 2022). Until the evaluation is complete and considered by Department officials for potential issuance of a new ROD, the BLM will not offer tracts in an oil and gas lease sale in the NPR-A in areas newly opened to leasing under the 2020 ROD. *See* Exhibit A.

Accordingly, Defendants hereby seek to continue the stay of all proceedings in this action for a period of 120 days to and including January 5, 2022 to allow BLM to follow the directive and conduct its evaluation. An extension of the existing stay would continue to conserve the time and resources of the parties and the Court. Not later than the end of the 120-day stay period, the undersigned parties would file a joint status report advising the Court what further proceedings may be necessary, or would file separate status reports setting out their proposals if

necessary.

Undersigned counsel have conferred with counsel to the other parties. Plaintiffs authorize undersigned counsel to submit this as a joint status report. Plaintiffs do not oppose Defendants' request for an extension of the stay, but reserve the right to take any position, including a request that the stay be lifted, in response to any future action Defendants take with regard to the IAP. Intervenor-Defendant State of Alaska opposes Defendants' request for extension of the stay.

DATED: September 7, 2021.      Todd Kim  
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/s/ Caitlin Cipicchio  
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