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**FILED**  
JAN 30 2015  
Clerk, U.S. District Court  
District Of Montana  
Missoula

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FEDERATION, IDAHO STATE SNOWMOBILE ASSOCIATION,  
COLORADO SNOWMOBILE ASSOCIATION,  
COLORADO OFF-HIGHWAY VEHICLE COALITION,  
MONTANA FARM BUREAU FEDERATION,  
WASHINGTON FARM BUREAU, and WYOMING  
FARM BUREAU FEDERATION

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
MISSOULA DIVISION

DEFENDERS OF WILDLIFE,

Plaintiff,

v.

SALLY JEWELL, Secretary, U.S.  
Department of the Interior, in her official  
capacity; DANIEL M. ASHE, Director,  
U.S. Fish and Wildlife Service, in his  
official capacity; and the UNITED STATES  
FISH AND WILDLIFE SERVICE

Defendants.

No. CV 14-246-M-DLC

(Consolidated with Case Nos.  
14-247-M-DLC and 14-250-M-  
DLC)

**MOTION TO INTERVENE  
OR, IN THE  
ALTERNATIVE, TO  
PARTICIPATE AS AMICUS  
CURIAE**

Applicant Defendant-Intervenors Idaho Farm Bureau Federation, Wyoming Farm Bureau, Montana Farm Bureau Federation, Washington Farm Bureau, Idaho State Snowmobile Association, Colorado Snowmobile Association, and Colorado Off-Highway Vehicle Coalition hereby move to intervene as of right in this case pursuant to Federal Rule of Civil Procedure 24(a). Should this Court deny Applicants permission to intervene in any form, Applicants move to be admitted as amicus curiae.

Pursuant to Local Rule 7.1(c)(1), counsel for all parties were previously notified of Applicants' intent to file this Motion to Intervene. Federal Defendants, Sally Jewell, Secretary of the Interior, Dan Ashe, Director of the United States Fish and Wildlife Service, and the United States Fish and Wildlife Service have taken no position on Applicants' motion. Plaintiffs Center for Biological Diversity, Conservation Northwest, Friends of the Clearwater, Greater Yellowstone Coalition, Idaho Conservation League, Jackson Hole Conservation Alliance, Klamath-Siskiyou Wildlands Center, and Rocky Mountain Wild have also not yet taken a position on Applicants' motion. Plaintiffs Defenders of Wildlife, Wildearth Guardians, Friends of the Bitterroot, Friends of the Wild Swan, The Swan View Coalition, Oregon Wild, Cascadia Wildlands, Alliance for the Wild Rockies, Cottonwood Environmental Law Center, George Wuerthner, Kootenai Environmental Alliance, Footloose Montana, Native Ecosystems Council, Wildlands Network, Helena Hunters and Anglers Association do not oppose this motion.

The motion is based on the pleadings and papers filed in this action, the accompanying memorandum, and any additional response, evidence, or argument that counsel will make. If intervention is granted, Applicants intend to file the attached Answer in Intervention.

Plaintiff seeks an order compelling Federal Defendants to list the wolverine in the lower forty-eight as a threatened species. Should Plaintiffs succeed, Applicants

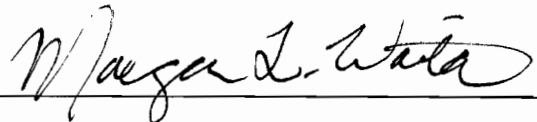
will suffer economic harm, as well as restrictions on their property and liberty interests.

Applicants respectfully submit the accompanying memorandum of points and authorities in support of their concurrently filed motion to intervene, or, in the alternative, participate as amicus curiae.

DATED: January 29, 2015.

Respectfully submitted,

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By 

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### CERTIFICATE OF SERVICE

I hereby certify that the foregoing MOTION TO INTERVENE OR, IN THE ALTERNATIVE, PARTICIPATE AS AMICUS CURIAE, was filed with the Clerk this 29th day of January, 2015, via Federal Express. I further certify that copies of the foregoing MOTION were served this day via first-class mail, postage prepaid, upon each of the following:

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