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**Pro Hac Vice* Pending

Attorneys for Applicant Defendant-Intervenors

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

CENTER FOR BIOLOGICAL DIVERSITY,) No. 3:17-cv-00091-JWS
)
Plaintiff,)
)
v.)

9. As a licensed Alaska Master Guide/Outfitter, and based on my experience in hunting in Alaska, I have observed that wolves and bears are voracious predators, and if left unmanaged, they will eliminate the ungulate populations in Alaska.

10. As a professional hunter-guide, I have a direct interest in controlling the predator population in Alaska and in conserving the diverse wildlife populations and their habitats.

11. As part of my full-time profession, I stay up to date on state and federal environmental laws, rules, and regulations. I am familiar with the “Non-Subsistence Take of Wildlife, and Public Participation and Closure Procedures, on National Wildlife Refuges in Alaska” (Refuges Rule). 81 Fed. Reg. 52,248 (Aug. 5, 2016). I understand that this Refuges Rule was withdrawn pursuant to Public Law No. 115-20. I further understand that through this Lawsuit, Plaintiff Center for Biological Diversity seeks to reinstate the Refuges Rule.

12. I am well aware of the Refuges Rule and the impact that its reinstatement would have on my profession and on Alaska’s wildlife population and habitats. Reinstatement of the Refuges Rule would prevent me from helping to manage the predator population in the National Wildlife Refuges in Alaska.

13. I have direct interest in this Lawsuit. My access to and use of National Wildlife Refuges in Alaska will be severely restricted if the Refuges Rule is reinstated.

* * *

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed in Klawock, Alaska on May 3, 2017

s/ Kurt Whitehead (consent)
KURT WHITEHEAD