

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

STATE OF CALIFORNIA, et al.,)
)
 Plaintiffs,)
)
 v.)
)
 ELAINE L. CHAO, et al.,)
)
 Defendants,)
)
 and)
)
 THE COALITION FOR SUSTAINABLE)
 AUTOMOTIVE REGULATION and THE)
 ASSOCIATION OF GLOBAL)
 AUTOMAKERS, INC.,)
)
 Movant-Intervenors.)

No: 1:19-cv-2826-KBJ

ENVIRONMENTAL DEFENSE FUND, et al.,)
)
 Plaintiffs,)
)
 v.)
)
 ELAINE L. CHAO, et al.,)
)
 Defendants,)
)
 and)
)
 THE COALITION FOR SUSTAINABLE)
 AUTOMOTIVE REGULATION and THE)
 ASSOCIATION OF GLOBAL)
 AUTOMAKERS, INC.,)
)
 Movant-Intervenors.)

No: 1:19-cv-2907-KBJ

[PROPOSED] NOTICE OF INTENT TO JOIN IN DEFENDANTS' MOTION TO DISMISS OR TRANSFER BY THE COALITION FOR SUSTAINABLE AUTOMOTIVE REGULATION AND THE ASSOCIATION OF GLOBAL AUTOMAKERS, INC.

Pursuant to Federal Rule of Civil Procedure 24(c) and Local Civil Rule 7(j), and consistent with the Court's General Order and Guidelines Applicable to APA Cases, *see* Dkt. No. 10, the Coalition for Sustainable Automotive Regulation and the Association of Global Automakers, Inc. (collectively, "Movant-Intervenors") hereby give notice of their intent to join in Defendants' Motion to Dismiss or Transfer, conditioned upon the Court's grant of Movant-Intervenors' Motion to Intervene filed concurrently herewith.

Defendants served their Motion to Dismiss or Transfer on Plaintiffs in each of the above-captioned proceedings on October 15, 2019. *See* Dkt. Nos. 26, 27. Under the Court's briefing schedule, Plaintiffs will serve their responses (one consolidated response for Plaintiffs in No. 1:19-cv-2826-KBJ and a separate consolidated response for Plaintiffs in No. 1:19-cv-2907-KBJ) on November 14, 2019. Defendants will serve their reply (one consolidated response in support of Defendants' motion) on November 27, 2019. Having conferred with counsel for Plaintiffs and Defendants, Movant-Intervenors do not propose to alter this briefing schedule.

Respectfully submitted,

Dated: October 31, 2019

/s/ Raymond B. Ludwiszewski

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