

1 Matthew K. Bishop (New Mexico Bar # 17806) *pro hac vice*
Western Environmental Law Center
2 P.O. Box 1507
3 Taos, New Mexico 87571
tel: (505) 751-0351
4 fax: (505) 751-1775
5 bishop@westernlaw.org

6 Julia A. Olson (California Bar # 192642) *pro hac vice*
Wild Earth Advocates
7 2985 Adams Street
Eugene, Oregon 97405
8 tel: (541) 344-7066
9 fax: (541) 344-7061
jaoearth@aol.com

10 Attorneys for Plaintiffs

11
12 IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

13
14 River Runners for Wilderness, *et al.*,) No. CV-06-0894 PCT-DGC
15 Plaintiffs,)
16 v.)
17) PLAINTIFFS' MOTION FOR
18 Joseph F. Alston, *et al.*,) SUMMARY JUDGMENT
(ORAL ARGUMENT
19 Federal-Defendants; and) REQUESTED)
20 Grand Canyon River Outfitters)
21 Association; Grand Canyon Private)
Boaters Association,)
22 Defendant-Intervenors.)
23)

24
25 Pursuant to Rule 56 of the Federal Rules Civil Procedure, Plaintiffs, River Runners
26 for Wilderness *et al.*, hereby submit this motion for summary judgment. The reasons and
27 authority supporting this motion for summary judgment are set forth in the accompanying
28

1 memorandum of law, attached exhibits, and statement of undisputed material facts. As
2 this is a record review case brought under the Administrative Procedure Act (“APA”), 5
3 U.S.C. § 706, the “undisputed” material facts for summary judgment purposes is evidence
4 that is (or should be) contained in the administrative record. See Great Basin Mine Watch
5 v. Hankins, 456 F. 3d 955, 961 (9th Cir. 2006) (“summary judgment may be granted to
6 either party based upon . . . review of the administrative record”).
7

8 Respectfully submitted this 25th day of May, 2007.

9 /s/ Matthew K. Bishop

10 Matthew K. Bishop (New Mexico Bar # 17806) *pro hac vice*
11 Western Environmental Law Center
12 P.O. Box 1507
13 Taos, New Mexico 87571
14 tel: (505) 751-0351
15 fax: (505) 751-1775
16 bishop@westernlaw.org

17 /s/ Julia A. Olson

18 Julia A. Olson (California Bar # 192642) *pro hac vice*
19 Wild Earth Advocates
20 2985 Adams Street
21 Eugene, Oregon 97405
22 tel: (541) 344-7066
23 fax: (541) 344-7061
24 jaoearth@aol.com

25 Attorneys for Plaintiffs
26
27
28