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12
13 IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA
14

15 UNITED STATES OF AMERICA,) Civil Case No. 2:17-cv-02508
16 and)
17 THE STATE OF NEVADA) MOTION TO LODGE
Plaintiffs,) CONSENT DECREE
18 v.)
19 THE CITY OF NORTH LAS VEGAS,)
20 Defendant.)
21

22 Plaintiffs, the United States of America and the State of Nevada, respectfully notify the
23 Court that Plaintiffs are lodging a proposed Consent Decree in this case which was entered into
24 with Defendant City of North Las Vegas (“North Las Vegas”). The Consent Decree is provided
25 to the Court and a copy is available in the office of Assistant United States Attorney Troy K.
26 Flake, United States Attorney’s Office, 501 Las Vegas Blvd., South, Suite 1100, Las Vegas, NV
27 89101.
28

1 The Court should not yet sign the Consent Decree. Instead, the proposed Consent Decree
2 should remain lodged with the Court while the United States provides an opportunity for public
3 comment in accordance with the Department of Justice regulations codified at 28 C.F.R. § 50.7.

4 The Department will publish in the Federal Register a notice that the proposed Consent
5 Decree has been lodged with the Court. The notice will solicit public comment for a period of
6 thirty (30) days. During the comment period, no action is required of the Court.

7 After the close of the comment period, the United States will evaluate the comments
8 received, if any, and advise the Court as to whether the United States requests that the Consent
9 Decree be entered in this case.

10 Respectfully submitted,
11 STEVEN W. MYHRE
12 Acting United States Attorney

13 /s/Troy K. Flake
14 TROY K. FLAKE
15 Assistant United States Attorney
16 ESPERANZA ANDERSON
17 Senior Counsel
18 Environment and Natural Resources Division
19 Environmental Enforcement Section

18 **PROOF OF SERVICE**

19 I, Troy K. Flake, hereby certify that the **MOTION TO LODGE CONSENT DECREE**
20 was served this date on all parties via the Court’s Electronic Case Filing system.

21 Micaela Moore
22 moorem@cityofnorthlasvegas.com

23 Christopher Craft
24 craffc@cityofnorthlasvegas.com

25 Dated this 27th day of September 2017.

26 /s/Troy K. Flake
27 TROY K. FLAKE
28 Assistant United States Attorney