

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

NATURAL RESOURCES DEFENSE)
COUNCIL,)
))
Plaintiff,)
))
v.)
))
ANDREW WHEELER, in his official)
capacity as Administrator of the U.S.)
Environmental Protection Agency, *et al.*,)
))
Defendants,)
))
and)
))
CROPLIFE AMERICA,)
))
Defendant-Intervenor.)

Civil Action No. 1:17-CV-02034-TSC

Hon. Tanya S. Chutkan

**UNOPPOSED, JOINT MOTION TO APPROVE THE STIPULATED PARTIAL
SETTLEMENT AGREEMENT**

Plaintiff Natural Resources Defense Council and Federal Defendants Environmental Protection Agency (“EPA”) and Andrew Wheeler in his official capacity as Administrator of EPA jointly move this Court for approval of the attached Stipulated Partial Settlement Agreement (“Exhibit A”). Defendant-Intervenor CropLife America does not oppose, but has not joined the Stipulated Partial Settlement Agreement. In support of this motion, Plaintiff and Federal Defendants state:

1. The Court stayed proceedings to allow the Parties to engage in settlement discussions. Dkt. No. 41.
2. The Parties have engaged in settlement discussions and reported their progress to the Court in a series of monthly status reports. Dkt. Nos. 42, 44-53.

3. Plaintiff and Federal Defendants have reached a partial agreement to resolve Claim Three (Imidacloprid) of Plaintiff's Complaint (Dkt. No. 1), as amended by the Stipulation of Partial Dismissal (Dkt. Nos. 15 & 16).
4. Defendant-Intervenor CropLife America does not oppose, but has not joined the Stipulated Partial Settlement Agreement.
5. Accordingly, the Parties seek review and approval by the Court of their Stipulated Partial Settlement Agreement.

WHEREFORE, the Parties respectfully request that the Court approve the attached Stipulated Partial Settlement Agreement ("Exhibit A") and Proposed Order.

Date: January 15, 2021

Respectfully submitted,

/s/ Jolie D. McLaughlin

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/s/ Briena L. Strippoli (with permission on 1/14/21)

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CERTIFICATE OF SERVICE

I hereby certify that on January 15, 2021, I electronically filed the foregoing Unopposed, Joint Motion to Approve the Stipulated Partial Settlement Agreement and attached Proposed Stipulated Partial Settlement Agreement with the Clerk of the Court using the CM/ECF system, which will send notification of this filing to the attorneys of record.

Date: January 15, 2021

/s/ Jolie D. McLaughlin