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Counsel for Defendants Peter K. Michael and Todd Parfitt

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

WESTERN WATERSHEDS PROJECT;)
 NATIONAL PRESS PHOTOGRAPHERS)
 ASSOCIATION; and NATURAL RESOURCES)
 DEFENSE COUNCIL,)

Plaintiffs,)

v.)

Civil No. 15-cv-169-S

PETER K. MICHAEL, in his official capacity)
 as Attorney General of Wyoming; TODD)
 PARFITT, in his official capacity as Director)
 of the Wyoming Department of Environmental)
 Quality; PATRICK J. LEBRUN, in his official)
 capacity as County Attorney of Fremont)
 County, Wyoming; JOSHUA SMITH, in his)
 official capacity as County Attorney of)
 Lincoln County, Wyoming; CLAY KAINER,)
 in his official capacity as County and)
 Prosecuting Attorney of Sublette County,)
 Wyoming,)

Defendants.)

STATE DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Pursuant to Rule 56 of the Federal Rules of Civil Procedure and Local Rule 7.1(b)(2), Attorney General Peter K. Michael and Department of Environmental Quality Director Todd Parfitt (the State Defendants) hereby move for summary judgment on Plaintiffs' sole remaining claim – that Wyoming Statute § 6-3-414(c) (2016) and Wyoming Statute § 40-27-101(c) (2016) violate the First Amendment of the United States Constitution. For the reasons set forth in the accompanying Memorandum in Support, the State Defendants respectfully request that this Court grant their motion for summary judgment.

Submitted May 30, 2018.

/s/ Erik Petersen

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CERTIFICATE OF SERVICE

I certify that on the 30th day of May 2018, I electronically filed the foregoing with the Clerk of the U.S. District Court of Wyoming using the CM/ECF system, which sent a notice of electronic filing to all counsel of record.

/s/ Erik Petersen

Erik E. Petersen