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15 *Counsel for Plaintiff*

16 **IN THE UNITED STATES DISTRICT COURT FOR THE**
17 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

18 NATIONAL PARKS CONSERVATION)
19 ASSOCIATION,)
20)
21 Plaintiff,)
22)
23 v.)
24 U.S. DEPARTMENT OF THE INTERIOR,)
25 *et al.*,)
26)
27 Defendants.)
28)

No.: 2:26-cv-4002-CAS-AS

PLAINTIFF’S NOTICE OF MOTION
AND MOTION FOR PRELIMINARY
INJUNCTION

Date: July 27, 2026

Time: 10:00 AM

Judge: Hon. Christina A. Snyder

1 TO THE COURT, ALL PARTIES, AND COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure
3 65(a) and Civil Local Rules 6-1 and 65-1, Plaintiff National Parks Conservation
4 Association (NPCA) hereby files this Notice of Motion and Motion for Preliminary
5 Injunction (Motion) and moves this Court for a preliminary injunction to enjoin
6 Defendants (1) to set aside their April 2025 determination that allowed new mining
7 operations to proceed at the Colosseum Mine in Mojave National Preserve, (2) to halt
8 and prohibit further operations at Colosseum pending the resolution of this case, and
9 (3) to monitor and enforce public access rights along Colosseum Road leading to and
10 past Colosseum Mine. As set forth in the accompanying Memorandum of Points and
11 Authorities, such relief is necessary to prevent Defendants' authorization of mining
12 operations at Colosseum from causing irreparable harm to Mojave National Preserve
13 and the public while this case is adjudicated.

14 This Motion is based on the allegations in NPCA's Complaint for Declaratory
15 and Injunctive Relief (Dkt. No. 1), the Memorandum of Points and Authorities and
16 Declarations of Chance Wilcox and James André, filed herewith, and any other
17 written or oral evidence or argument presented at or before the time this Motion is
18 heard by the Court. NPCA is also filing herewith a Proposed Order.

19 Pursuant to Civil Local Rules 6-1 and 65-1, NPCA hereby designates July 27,
20 2026 as the Motion Day on which this Motion may be heard by the Court. On June 18,
21 2026, NPCA advised counsel of record for Defendants of NPCA's intent to file this
22 motion.

23
24 Dated: June 23, 2026

Respectfully submitted,

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27 /s/ Katrina A. Tomas
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