

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

SIMON V. KINSELLA

*Plaintiff,*

v.

BUREAU OF OCEAN ENERGY MANAGEMENT;  
DEB HAALAND, Secretary of the Interior, U.S.  
Department of the Interior;  
MICHAEL S. REGAN, Administrator, U.S.  
Environmental Protection Agency.

*Defendants.*

Civil Action No. 22-cv-02147-(JMC)

**MOTION TO TRANSFER VENUE  
TO THE EASTERN DISTRICT OF NEW YORK**

Defendants respectfully move the Court to transfer this action to the United States District Court for the Eastern District of New York, where a prior-filed action challenging the same federal agency action **as challenged** in this case is currently pending. Plaintiff reports that he opposes this Motion. In support of this Motion the attention of the Court is respectfully directed to the Memorandum in Support filed herewith.

Respectfully submitted this 8<sup>th</sup> day of September, 2022.

TODD KIM

Assistant Attorney General  
Environment & Natural Resources Division

/s/ Amanda M. Stoner

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