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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

EAST BAY SANCTUARY COVENANT, et al.,

Plaintiffs,

vs.

WILLIAM BARR, et al.,

Defendants.

Case No. 4:19-cv-04073-JST

[Judge: Hon. Jon S. Tigar]

PROPOSED PLAINTIFF-INTERVENORS' NOTICE OF SUPPLEMENTAL AUTHORITY

Date Action Filed: July 16, 2019

Proposed Plaintiff-Intervenors ("Intervenors") respectfully submit this Notice of Supplemental Authority to inform the Court of a recent decision of the United States District Court for the District of Columbia Circuit in *Kiakombua et al v. Wolf et al*, Case No. 19-CV-1872 (KBJ), 2020 WL 6392824 (D.D.C. Oct. 31, 2020), attached hereto as Exhibit A.

Kiakombua is supplemental authority in support of Intervenors' motions for a preliminary injunction and for leave to intervene. ECF No. 95. This decision is relevant to the issue raised in the Court's temporary restraining order dated October 17, 2020, (ECF No. 98 at pp. 6-7) and Intervenors' Reply Memorandum of Points and Authorities in Further Support of their Motion for a Preliminary Injunction, (ECF No. 112 at pp. 12 through 15 of 21 [Section III.A.2], pp. 20 through 21 of 21 [Section III.D]). More specifically, *Kiakombua* supports Intervenors' argument that intervention in this action as Plaintiffs would provide them the opportunity to obtain the relief they seek. *See Kiakombua*, 2020 WL 6392824, at *33-*40.

Dated: November 4, 2020

Respectfully submitted,

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By *_/s/ Caroline J. Heller_*

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