

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

HORNBECK OFFSHORE SERVICES, \*  
L.L.C., \*  
**Plaintiff** \*

CIVIL ACTION  
NO. 10-1663(F)(2)

VERSUS \*

SECTION F

KENNETH LEE “KEN” SALAZAR, \*  
IN HIS OFFICIAL CAPACITY AS \*  
SECRETARY, UNITED STATES \*  
DEPARTMENT OF INTERIOR; \*  
UNITED STATES DEPARTMENT \*  
OF INTERIOR; ROBERT “BOB” \*  
ABBEY, IN HIS OFFICIAL \*  
CAPACITY AS ACTING DIRECTOR, \*  
MINERALS MANAGEMENT \*  
SERVICE; AND MINERALS \*  
MANAGEMENT SERVICE, \*  
**Defendants** \*

JUDGE FELDMAN

MAGISTRATE 2  
MAGISTRATE WILKINSON

\* \* \* \* \*

**PLAINTIFFS’ AND DEFENDANTS’ JOINT UNOPPOSED MOTION TO CONTINUE  
HEARING AND EXTEND AMENDMENT DEADLINE**

NOW INTO COURT, through undersigned counsel, come Plaintiffs, Hornbeck Offshore Services, L.L.C., the Chouest Entities and the Bollinger Entities (collectively, “Plaintiffs”), and Defendants, Kenneth Lee “Ken” Salazar, the United States Department of the Interior, Michael R. Bromwich, and the Bureau of Ocean Energy Management, Regulation, and Enforcement (collectively, “Defendants”), which respectfully move this Court to enter an Order continuing the

hearing on Plaintiffs' Motion for Recovery of Attorneys' Fees (Rec. Doc. 213) to February 2, 2011, and extending the deadline for amendments to pleadings as established by the Court's Scheduling Order dated November 9, 2010 (Rec. Doc. 201) until January 10, 2011. As certified below by undersigned counsel, third-party intervenors are unopposed to this Joint Unopposed Motion. For the reasons set forth in the memorandum in support filed herewith good cause exists and Plaintiffs' and Defendants' Joint Unopposed Motion should be granted.

WHEREFORE, Plaintiffs and Defendants respectfully request that the Court grant their Joint Unopposed Motion to Continue Hearing and Extend Amendment Deadline and enter an Order continuing the hearing on Plaintiffs' Motion for Recovery of Attorneys' Fees to February 2, 2011, and extending the deadline for amendments to pleadings to January 10, 2011.

Respectfully submitted,

*s/ Carl D. Rosenblum*

---

CARL D. ROSENBLUM, T.A. (2083)  
GRADY S. HURLEY (13913)  
ALIDA C. HAINKEL (24114)  
MARJORIE A. MCKEITHEN (21767)  
JONES, WALKER, WAECHTER, POITEVENT,  
CARRÈRE & DENÈGRE  
201 St. Charles Avenue, 49<sup>th</sup> Floor  
New Orleans, Louisiana 70170  
Telephone: (504) 582-8000 - Fax: (504) 589-8170  
crosenblum@joneswalker.com

And

JOHN F. COONEY  
(admitted Pro Hac Vice)  
Venable LLP  
575 7<sup>th</sup> Street, N.W.  
Washington, D.C. 20004  
Telephone: (202) 344-4812  
**Attorneys for Plaintiffs,  
Hornbeck Offshore Services, L.L.C.,  
The Chouest Entities, and The Bollinger Entities.**

And

IGNACIA S. MORENO  
Assistant Attorney General  
Environment & Natural Resources Division

*s/ Brian Collins*

---

GUILLERMO A. MONTERO (T.A.)  
BRIAN COLLINS  
KRISTOFOR R. SWANSON  
U.S. Department of Justice  
Environment & Natural Resources Division  
Natural Resources Section  
Tel: (202) 305-0445

PETER MANSFIELD  
Assistant United States Attorney  
Eastern District of Louisiana  
Hale Boggs Federal Building  
500 Poydras Street, Suite B-210  
New Orleans, Louisiana 70130  
Tel: (504)680-3000  
**Attorneys for Defendants,  
Kenneth Lee “Ken” Salazar,  
the United States Department of the Interior,  
Michael R. Bromwich, and  
the Bureau of Ocean Energy Management,  
Regulation, and Enforcement**

**CERTIFICATE OF AUTHORIZATION TO FILE JOINTLY AND OF NO OPPOSITION**

I hereby certify that counsel of record for Defendants, Kenneth Lee “Ken” Salazar, the United States Department of the Interior, Michael R. Bromwich, and the Bureau of Ocean Energy Management, Regulation, and Enforcement, has authorized me to electronically file the above and foregoing pleading on behalf of Defendants.

I further certify that I have verified with counsel of record for Plaintiff-Intervenors, Diamond Offshore Company and Diamond Offshore Management Company, and counsel of record for Defendant-Intervenors, Florida Wildlife Federation, the Sierra Club, and Center for Biological Diversity, that those parties are unopposed to the above and foregoing pleading.

New Orleans, Louisiana, this 8th day of December, 2010.

*s/ Carl D. Rosenblum*

---

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing pleading has been served upon all parties by email or by using the CM/ECF system which will send a Notice of Electronic filing to all counsel of record, this 8th day of December, 2010.

*s/ Carl D. Rosenblum*

---