

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF LOUISIANA

HORNBECK OFFSHORE SERVICES,  
L.L.C.,

Plaintiff

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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;

\*  
\*

JUDGE FELDMAN

ROBERT “BOB” ABBEY, IN HIS OFFICIAL  
CAPACITY AS ACTING DIRECTOR,  
MINERALS MANAGEMENT SERVICE;  
AND MINERALS MANAGEMENT SERVICE,

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MAGISTRATE 2  
MAGISTRATE WILKINSON

Defendants

\* \* \* \* \*

**PLAINTIFFS’ MEMORANDUM IN SUPPORT OF EX PARTE MOTION  
FOR LEAVE TO FILE A REPLY BRIEF IN RESPONSE TO DEFENDANTS’  
OPPOSITION TO PLAINTIFFS’ MOTION FOR RECOVERY OF ATTORNEY’S FEES**

NOW INTO COURT, through undersigned counsel, come Plaintiffs, Hornbeck Offshore Services, L.L.C., the Chouest Entities and the Bollinger Entities (“Plaintiffs”), which respectfully submit this memorandum in support of their ex parte motion for leave to file a reply brief in response to Defendants’ opposition to Plaintiffs’ Motion for Recovery of Attorney’s Fees. *See* Rec. Docs. 213 and 220. Plaintiffs respectfully submit that their reply brief is necessary to clarify and fully address the arguments and issues presented in Defendants’ opposition.

Plaintiffs ask for leave to file the attached reply brief, which responds only to matters set forth in Defendants’ opposition, to assist the Court in ruling on the issues raised by Plaintiffs’ Motion for Recovery of Attorney’s Fees, particularly with respect to conduct that meets the legal

standards for civil contempt and a finding of bad faith. Plaintiffs further submit that granting them leave to file their reply brief will not delay the proceedings or prejudice the parties. For these reasons, Plaintiffs respectfully pray that this Court grant them leave to file their reply brief.

Respectfully submitted,

*s/ Carl D. Rosenblum*

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**Attorneys for Plaintiffs,  
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The Chouest Entities and The Bollinger Entities**

**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 31<sup>st</sup> day of January, 2011.

*s/ Carl D. Rosenblum*