

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

HORNBECK OFFSHORE SERVICES, L.L.C.,	*	CIVIL ACTION NO. 10-1663(F)(2)
Plaintiff	*	
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,	*	JUDGE FELDMAN
	*	
	*	MAGISTRATE 2 MAGISTRATE WILKINSON
	*	
Defendants	*	
* * * * * *		

PLAINTIFFS’ MOTION TO ENFORCE PRELIMINARY INJUNCTION ORDER

NOW INTO COURT, through undersigned counsel, come Plaintiffs, Hornbeck Offshore Services, L.L.C. (“Hornbeck”), the Bollinger Entities and the Chouest Entities (collectively, “Plaintiffs”), which respectfully request entry of an Order of the Court enforcing the Court’s June 22, 2010 Order pursuant to which the Court “immediately prohibited” Defendants “from enforcing the Moratorium, entitled ‘Suspension of Outer Continental Shelf (OCS) Drilling of New Deepwater Wells,’ dated May 28, 2010, and NTL No. 2010-N04 seeking implementation of

the Moratorium, as applied to all drilling on the OCS in water depths greater than 500 feet.” (Rec. Doc. 68) (the “Preliminary Injunction Order”). As discussed in the accompanying memorandum, the basis for Plaintiffs’ motion is that, just hours after the Court issued its Preliminary Injunction Order, Defendant Secretary Salazar announced the de facto continuance of the Moratorium in direct defiance of this Court’s Preliminary Injunction Order.

WHEREFORE, Plaintiffs respectfully request that the Court grant their Motion to Enforce Preliminary Injunction Order. A proposed order is attached hereto.

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, 49th 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 7th Street, N.W.
Washington, D.C. 20004
Telephone: (202) 344-4812

**Attorneys for Plaintiffs,
Hornbeck Offshore Services, L.L.C.,
The Bollinger Entities, and
The Chouest 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 23rd day of June 2010.

s/ Carl D. Rosenblum
