

**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**

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\*

**SECTION F**

**KENNETH LEE “KEN” SALAZAR, IN HIS  
OFFICIAL CAPACITY AS SECRETARY,  
UNITED STATES DEPARTMENT OF  
INTERIOR; UNITED STATES  
DEPARTMENT OF INTERIOR;**

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**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**

\*   \*   \*   \*   \*   \*   \*   \*

**MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFFS’ MOTION FOR  
EMERGENCY HEARING**

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 submit this memorandum of law in support of their Motion for Emergency Hearing seeking emergency consideration by the Court of their Motion to Enforce Preliminary Injunction Order. For the reasons detailed in the memorandum accompanying the

Motion to Enforce Preliminary Injunction Order, good cause exists for the Court to consider the relief requested by Plaintiffs on an emergency basis. Given the national significance of this matter, Secretary Salazar's sworn testimony before a Senate Committee today, recent statements to the media by the Department of the Interior, and the Court's scheduling considerations, it is imperative that Plaintiffs' Motion to Enforce Preliminary Injunction Order be heard at the earliest possible time. Secretary Salazar's statements constitute a de facto continuance of the Moratorium in direct violation of the Court's Preliminary Injunction Order dated June 22, 2010 (Rec Doc. 68). Thus, Plaintiffs' Motion to Enforce Preliminary Injunction Order should be considered by the Court on an emergency basis.

For the reasons set forth above, Plaintiffs respectfully submit that their Motion to Enforce Preliminary Injunction Order should be set for emergency hearing at the earliest available time.

Respectfully submitted,

*s/ Carl D. Rosenblum*

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**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*

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