IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF LOUISIANA

HORNBECK OFFSHORE SERVICES, LLC,)	
Plaintiff,)	
v.)	CIVIL ACTION NO. No. 10-1663(F)(2)
KENNETH LEE "KEN" SALAZAR, in his official capacity as Secretary, United)	SECTION F
States Department of the Interior; ROBERT "BOB" ABBEY, in his official))	JUDGE FELDMAN
capacity as Acting Director, Mineral)	MACISTDATE 2
Management Service; and MINERALS MANAGEMENT SERVICE,)	MAGISTRATE 2 MAGISTRATE WILKINSON
Defendants.)))	

MOTION REQUESTING DISCLOSURE OF FINANCIAL INTEREST OF THE COURT, IF ANY

On June 22, 2010, the Court granted Plaintiffs' Motion for a Preliminary Injunction of the Government's six-month moratorium suspending operations at 33 exploratory drilling operations in the Gulf of Mexico due to safety and environmental concerns. Plaintiffs in this case include a myriad of companies that provide services to support offshore oil and gas drilling, exploration,

and production activities in the Outer Continental Shelf of the Gulf. In addition to Plaintiffs, the companies that own and operate exploratory drilling rigs affected by the Moratorium include a number of large oil and gas corporations, such as Shell Offshore, Inc., Eni U.S. Operating Co., Inc, Transocean, Noble Energy, Inc., and ATP Oil and Gas Corporation. See Minerals Management Service, List of Current Deepwater Activity (as of June 21, 2010), available at http://www.gomr.mms.gov/homepg/offshore/deepwatr/Current_Deepwater_Activity.pdf.

Subsequent to the Court's ruling, Defendant-Intervenors became aware of a 2008 Financial Disclosure Report for Judge Feldman, which discloses that Judge Feldman then held stock in several oil and offshore energy companies, including Transocean, Ocean Energy Notes, Provident Energy, Peabody Energy Corp., EV Energy Partners, LP, Atlas Energy Resources, LLC, Parker Drilling Co., and ATP Oil and Gas Corp., among others. See 2008 Financial Disclosure Report, attached as Ex. A. Defendant-Intervenors learned of this disclosure report on June 22, 2010, subsequent to the Court's granting of the injunction. Defendant-Intervenors respectfully request that the Court release information sufficient to determine if Judge Feldman "has a financial interest in the subject matter in controversy or in a party to the proceeding, or any other interest that could be substantially affected by the outcome of the proceeding." See 28 U.S.C. § 455(b)(4).

Respectfully submitted, this 23rd day of June, 2010.

/s Catherine M. Wannamaker John Suttles

Louisiana Bar No. 19168

Catherine M. Wannamaker, Admitted Pro Hac Vice

Counsel for Defendant-Intervenor Defenders of Wildlife

SOUTHERN ENVIRONMENTAL LAW CENTER

/s Adam Babich Adam Babich

Louisiana Bar No. 27177

Counsel for Sierra Club TULANE ENVT'L LAW CLINIC 200 West Franklin Street, Suite 330

Chapel Hill, North Carolina 27516

Telephone: (919) 967-1450

(404)521-9900

Facsimile: (919) 929-9421

(404)521-9909

Email: jsuttles@selcnc.org

cwannamaker@selcga.org

6329 Freret St.

New Orleans, LA 70118 Telephone: (504)865-5789

Facsimile: (504)862-8721 Email: ababich@tulane.edu

/s Alisa A Coe

Alisa A. Coe

La. Bar No. 27999

David G. Guest

Fla. Bar No. 0267228

Pro Hac Vice Pending

Monica K. Reimer

Fla. Bar No. 0090069

Pro Hac Vice Pending

Earthjustice

P.O. Box 1329

Tallahassee, FL 32302-1329

Phone: (850) 681-0031

Fax: (850) 681-0031

/s Mitchell Bernard

Mitchell Bernard

NY Bar No. 1684307

Pro Hac Vice application forthcoming

Natural Resources Defense Counsel

40 West 20th Street

New York, NY 10011

Phone: (212)727-4469

Fax: (212)727-2700

David Pettit

CA Bar No. 67128

Pro Hac Vice application forthcoming

COUNSEL FOR NATURAL RESOURCES

1314 Second Street

Santa Monica, CA 90401

Phone: (310) 434-2300 Fax: (310) 434-2399

COUNSEL FOR SIERRA CLUB and FLORIDA WILDLIFE FEDERATION

FLORIDA DEFENSE COUNCIL, INC.

/s Miyoko Sakashita

Andrea A. Treece

CA Bar No. 237639

Miyoko Sakashita

CA Bar No. 239639

Pro Hac Vice applications forthcoming

351 California Street, Suite 600

San Francisco, CA 94104

Phone: (415) 436-9682

COUNSEL FOR CENTER FOR BIOLOGICAL DIVERSITY

CERTIFICATE OF SERVICE

I hereby certify that on June 23, 2010, I electronically filed the foregoing with the Clerk of court by using the CM/ECF system, which will send a notice of electronic filing to the following:

Carl David Rosenblum <u>crosenblum@joneswalker.com</u>

Alida C. Hainkel <u>ahainkel@joneswalker.com; rmiller@joneswalker.com</u>

Grady S. Hurley ghurley@joneswalker.com; dward@joneswalker.com

Guillermo A. Montero <u>guillermo.montero@usdoj.gov; efile_nrs.enrd@usdoj.gov;</u>

jane.bamford@usdoj.gov

Brian M. Collins <u>brian.m.collins@usdoj.gov; efile_nrs@usdoj.gov</u>

Sharon Denise Smith sharon.d.smith@usdoj.gov; Rosanne.alford@usdoj.gov;

jerrilyn.dufauchard@usdoj.gov

I further certify that I mailed the foregoing document and the notice of electronic filing by first-class mail to the following non-CM/ECF participants:

John F. Cooney Venable, LLP 575 7th St., NW Washington, DC 20004

Marjoria Ann McKeithen Jones Walker Place St. Charles 201 St. Charles Ave., Suite 5100 New Orleans, LA 70170-5100

/s/ John Suttles

John Suttles

Louisiana Bar No. 19168

SOUTHERN ENVIRONMENTAL LAW CENTER

Attorney for Defendant-Intervenor

Defenders of Wildlife

200 West Franklin Street, Suite 330 Chapel Hill, North Carolina 27516

Telephone: (919) 967-1450 Facsimile: (919) 929-9421

jsuttles@selcnc.org