

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

**HORNBECK OFFSHORE SERVICES,  
LLC, et al.**

**Plaintiffs,**

**v.**

**KENNETH LEE “KEN” SALAZAR, in  
his official capacity as Secretary, United  
States Department of the Interior;  
UNITED STATES DEPARTMENT OF  
THE INTERIOR; ROBERT “BOB”  
ABBEY, in his official capacity as Acting  
Director, Bureau of Ocean Energy  
Management, Regulation, and  
Enforcement; and BUREAU OF OCEAN  
ENERGY MANAGEMENT,  
REGULATION, AND ENFORCEMENT,**

**Defendants.**

**CIVIL ACTION No. 10-1663(F)(2)**

**SECTION F**

**JUDGE FELDMAN**

**MAGISTRATE 2  
MAGISTRATE WILKINSON**

**DEFENDANTS’ EX PARTE MOTION FOR EXPEDITED CONSIDERATION OF  
DEFENDANTS’ MOTION FOR STAY PENDING APPEAL**

Defendants, Kenneth Lee Salazar, United States Department of the Interior, Robert Abbey, and the Bureau of Ocean Energy Management, Regulation, and Enforcement, (“Defendants”), have filed a Motion for Stay Pending Appeal or in the Alternative for a Temporary Stay Until Resolution by the Court of Appeals of an Emergency Stay Request (“Motion for Stay Pending Appeal”) and, in connection therewith, hereby move the Court for expedited consideration of the Motion for Stay. In support of their request for expedited consideration, Defendants respectfully submit that the Court issued its Order and Reasons granting Plaintiffs’ Motion for Preliminary Injunction on June 22, 2010 (the “Opinion”) [Docket No. 67] and a subsequent Order granting Plaintiffs’ Motion for Preliminary Injunction (the “Order”), also on June 22, 2010. [Docket No. 68]. The Court’s Order mandated that Defendants

“are hereby immediately prohibited 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 at depths greater than 500 feet...”

Defendants plan to appeal the Court’s Opinion and Order and have filed a Notice of Appeal. Given the urgency of the public safety, environmental, and economic issues surrounding the suspension of deepwater drilling operations in the Gulf of Mexico, and this Court’s injunction, Defendants respectfully submit that good cause exists to expedite consideration of their Motion for Stay Pending Appeal.

WHEREFORE, Defendants respectfully request that this Court grant Defendants’ Ex Parte Motion for Expedited Consideration of Defendants’ Motion for Stay Pending Appeal. A proposed order is attached.

Dated: June 23, 2010

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/s/ Guillermo A. Montero  
GUILLERMO A. MONTERO (T.A.)  
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ATTORNEYS FOR FEDERAL DEFENDANTS

**CERTIFICATE OF SERVICE**

I hereby certify that on June 23, 2010, I caused a copy of the foregoing to be served through the Court's CM/ECF System to all parties.

/s/Guillermo A. Montero  
Guillermo A. Montero  
Attorney for Defendants