

- (2) Defendants would respond to Plaintiffs' motion by February 27, 2012;
- (3) Plaintiffs would reply by March 5, 2012.

For the reasons given in the accompanying Memorandum of Law, Plaintiffs respectfully request that the Court grant them leave to file the Supplemental Complaint.

Dated: January 6, 2012

Respectfully submitted,

s/ Mitchell S. Bernard

Mitchell S. Bernard (MB 5823)
Natural Resources Defense Council, Inc.
40 West 20th Street
New York, New York 10011
(212) 727-2700
(212) 727-1773 (fax)
mbernard@nrdc.org

Avinash Kar, admitted *pro hac vice*
Jennifer A. Sorenson, admitted *pro hac vice*
Natural Resources Defense Council, Inc.
111 Sutter Street, 20th Floor
San Francisco, California 94104
(415) 875-6100
(415) 875-6161 (fax)

Counsel for Plaintiffs

*Of Counsel for Plaintiff Center for Science
in the Public Interest:*

Stephen Gardner (SG 3964)
Center for Science in the Public Interest
5646 Milton Street, Suite 211
Dallas, Texas 75206
(214) 827-2774
(214) 827-2787 (fax)