

Matthew K. Bishop  
Western Environmental Law Center  
103 Reeder's Alley  
Helena, Montana 59603  
406-324-8011  
[bishop@westernlaw.org](mailto:bishop@westernlaw.org)

Michael A. Kauffman  
DRAKE LAW FIRM, P.C.  
111 North Last Chance Gulch  
Suite 3J, Arcade Building  
Helena, MT 59601  
406-502-1668  
[michael@drakemt.com](mailto:michael@drakemt.com)

*Counsel for Plaintiffs*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION

FRIENDS OF THE CRAZY  
MOUNTAINS, et al.,

Plaintiffs,

vs.

MARY ERICKSON, in her capacity  
as Forest Supervisor for the Custer-  
Gallatin National Forest, et al.,

Federal-Defendants.

19-CV-00066-SPW-TJC

MOTION FOR A  
PRELIMINARY  
INJUNCTION

*Action requested by  
August 1, 2019*

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiffs, Friends of the Crazy Mountains *et al.*, respectfully move this Court for a preliminary injunction to enjoin Federal-Defendants (“the Service”) from implementing and authorizing work on the Porcupine Ibex Trail Project (“Ibex project”) pending a final decision on the merits. The reasons and authority supporting this motion are set forth in the accompanying memorandum of law.

Counsel for Friends of the Crazy Mountains and counsel for the Service discussed this motion. On-the-ground work for the Ibex project is scheduled to commence on **August 1, 2019**. The Parties therefore agreed to an expedited briefing schedule with the aim of avoiding the need for a temporary restraining order and getting the motion fully briefed (and hopefully decided) **before August 1, 2019**. The Service’s response to this motion will be filed on or before **July 10, 2019**. Friends of the Crazy Mountain’s reply will be filed on or before **July 19, 2019**.

Respectfully submitted this 28<sup>th</sup> day of June, 2019.

/s/ Matthew K. Bishop  
Matthew K. Bishop

*Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I hereby certify that on this 28<sup>TH</sup> day of June, 2019, I filed a copy of this document electronically through the CM/ECF system, which caused all counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Matthew K. Bishop  
Matthew K. Bishop