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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA**

GROUND FISH FORUM, INC.,

Plaintiff,

v.

NATIONAL MARINE  
FISHERIES SERVICE, et al.,

Defendants.

Case No. 3:23-cv-00283-JMK

**MOTION FOR LEAVE TO FILE BRIEF OF  
AMICI CURIAE SENATOR DANIEL S. SULLIVAN  
AND REPRESENTATIVE MARY SATTTLER PELTOLA**

U.S. Senator Daniel S. Sullivan and U.S. Representative Mary Sattler Peltola respectfully move for leave to file the attached amicus curiae brief in support of defendants. *See* Exhibit A. Plaintiffs have indicated that they will provide their position after reviewing this motion within the time limits prescribed by the local rules. Defendants take no position on this motion. Intervenors consent. In support of this motion, amici state as follows:

1. Amici are two members of Congress who represent Alaska and Alaskans. Senator Sullivan currently serves on the United States Senate Committee on Commerce, Science and Transportation, which has jurisdiction over the Nation's marine fisheries, the regional fishery management councils, and the Northern Pacific Halibut Act of 1982, and is the Ranking Member of the Subcommittee on Oceans, Fisheries, Climate Change and Manufacturing. Representative Peltola currently serves on the United States House of Representatives Committee on Natural Resources, which has jurisdiction over fisheries and wildlife, marine affairs, and international fishing agreements.

2. Amici share a bipartisan interest in ensuring that courts and parties respect the non-partisan decision-making process that Congress established when creating regional fishery management councils. One of those councils, the North Pacific Fishery Management Council, is responsible for overseeing the public process that culminated in the approval of Amendment 123 to the Bering Sea and Aleutian Islands Fishery Management Plan.

3. Amici also share an interest in the continued well-being of the many Alaskans who depend on halibut and the Council's efforts to conserve Alaska's natural resources for the benefit of the fisheries and fishing communities that depend on them. Halibut is an important source of employment, income, and often essential subsistence for many of Alaska's coastal communities.

4. Amici seek leave to file the attached brief to address two discrete issues: (1) the nature of the public, consensus-building process that the Council undertakes

when managing fishing resources, and (2) the importance of ensuring that halibut resources are appropriately managed, in tandem with the International Pacific Halibut Commission, for long-term sustainable use by the commercial, recreational, and subsistence sectors, including both direct and indirect use.

5. Amici respectfully submit that these two issues provide essential context for evaluating the merits of this case and the arguments presented by both sides. This brief provides a unique perspective that is likely to be helpful to the Court as it considers the issues raised in plaintiff's motion for summary judgment.

WHEREFORE, given their substantial interest in this case, Senator Sullivan and Representative Peltola respectfully move for leave to file the attached brief as *amicus curiae*.

Respectfully submitted,

/s/ Ashley C. Parrish

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*Representative Mary Sattler Peltola*

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