



Defendants' multiple efforts to circumvent and moot it, this Court's preliminary injunction remains in full force and effect. Moreover, as the Court has now concluded, Defendants' July 12<sup>th</sup> moratorium is the "functional equivalent" of the first one in that it "covers precisely the same rigs and precisely the same deepwater drilling in the Gulf of Mexico." Rec. 165 at 2, 5. The July 12<sup>th</sup> moratorium therefore violates the preliminary injunction order because it continues, in a different guise, a prohibition as to "all drilling on the OCS in water at depths greater than 500 feet." Rec. Doc. 68.

For the reasons set forth more fully in the accompanying memorandum in support, Plaintiffs respectfully request that the Court enter an Order that: (a) orders that Defendants' July 12<sup>th</sup> moratorium violates this Court's June 22, 2010 Order by continuing to enforce the same moratorium "applied to all drilling on the OCS in water at depths greater than 500 feet;" (b) orders that Defendants comply with the terms of the June 22, 2010 Order; and (c) orders that Defendants are accordingly immediately prohibited from enforcement of the July 12<sup>th</sup> moratorium. A proposed order is attached hereto.

### **Conclusion**

For all the reasons set forth above, Plaintiffs ask this Court to grant their renewed motion to enforce preliminary injunction order.

Respectfully submitted,

*s/ Carl D. Rosenblum*

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing pleading has been served upon all parties by email or by using the CM/ECF system which will send a Notice of Electronic filing to all counsel of record, this 7<sup>th</sup> day of September, 2010.

*s/ Carl D. Rosenblum*

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